Comment Letters — Table of Contents

L1

Ed Brinson
7 Strawberry Point
Bellingham, WA 98229

October 10, 2002

DNR
SEPA Center
Washington Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

RE: Lake Whatcom PDEIS

Dear Sir or Madam:

I would like to comment on the Lake Whatcom PDEIS.

While I am a member of both the Nature Conservancy and the Wilderness Society, I am also a taxpayer who is concerned about schools.

It is my belief that the **least restrictive** landscape plan for the forested trust lands in the watershed is in the best interest of the entire community. I believe that it is possible (with careful planning and practices) to successfully log these forests without damaging either the soil or water. For this reason, I see no need to "lock up" these timber tracts. C1 + C2

Thank you.

Sincerely,

Ed Brinson

L2

Goodyear Nelson
Hardwood Lumber Co., Inc.
A SWANER COMPANY
P.O. Box 997 • Bellingham, Washington 98227 • Phone: (360) 733-3960 • FAX: (360) 733-0803

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OCT 16 2002
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October 11, 2002

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

Last nights hearing in Bellingham made it difficult to respond to the Alternatives. I hope C 1
that the Preferred Alternative is one as close to Alternative one as possible. Going from
managing 75% of your land down to 57% of your land in one step is simply not
acceptable! It seems to me, given the water quality reports from DOE and DOH that C 2
forest management in the watershed has been very good! It would appear that Lake
Whatcom needs most of its protection from the people living and playing around the lake.
The current management regime used by the DNR along with watershed analysis will
more than protect the lake from forestry.
The Board may want to look at a new process that brings together land managers and
watershed managers to come up with a Preferred Alternative that treats the trusts more
fairly than these five Alternatives.

Sincerely,

Paul Kriegel

Paul Kriegel
Resource Manager

L8

Karl G. Stout & Sons Forestry Inc.
8580 Turners Bay Place
Anacortes, WA. 98221

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OCT 18 2002
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October 14, 2002

Department of Natural Resources
SEPA Center
P.O. Box 47015
Olympia, WA. 98504-7015

I do not agree with having only 5 Alternatives in he Lake Whatcom Plan when there are 7 Alternatives in the Sustained Yield Study.
There should be more options than the five in this plan as the five leave very limited choices, going from barely acceptable to not acceptable in one Alternative. The only C1
acceptable Alternative is number 1 & I understand that it is not available.
There needs to be an Alternative as close to number 1 as possible. With the watershed analysis plan, HCP, & now the forest and fish agreement there will be plenty of protection for the watershed. With these protections already in place, it's time to start C2
managing these lands for the benefit of the trusts as well as protecting the water in the lake.

Sincerely,
Karl G. Stout

L9

Karl G. Stout & Sons Forestry Inc.
8580 Turners Bay Place
Anacortes, WA. 98221

October 14, 2002

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OCT 16 2002

STATE LANDS DIV

Department of Natural Resources
SEPA Center
P.O. Box 47015
Olympia, WA. 98504-7015

The DOE & OOH reports show that water quality in Lake Whatcom will not be significantly by forest management activities. With the protections already in place, its time to maximize the returns to the trusts. The only Alternative that makes any sense an the only one that comes close to being reasonable management is Alternative 1 .If the Alternative is not available a new one as close to it as possible should be written. C1

Sincerely,

Karl G. Stout

L5

From: Peter Costanti
4 Costanti Lane
Sedro-Woolley, WA 98284

October 15, 2002

To: William Wallace, DNR Northwest Regional Manager
SEPA Center, Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Comments Regarding Lake Whatcom PDEIS:

I believe the Lake Whatcom Landscape Plan, Alternative #5 should be implemented. C1
The watershed will be vulnerable after it has been logged because of the scraping of little to no existing dirt from a rock foundation. If it is logged, there will be little dirt, earth, or material left to generate a tree, let alone a forest to rebuild the watershed. In harvesting the timber, you will be bulldozing the dirt, losing the minerals, and soil will be lost. All will end up in Lake Whatcom via erosion because there will be nothing left on the steep terrain to slow down the existing and changing run-off. C2 C3

The trees we talk about grow ten to fifteen years under ideal conditions at the nursery. On the steep terrain above Lake Whatcom, reduced to rock, how long will it take to rebuild the watershed? If it were on more suitable ground for logging, I would support a different alternative.

If the watershed is logged the possibilities are increased for rock and mudslides because of the rain, snow and freezing conditions on Lookout Mountain. How many cubic yards of earth will be transported to the lake and the Bellingham Municipal water system? C2a C3a

Sincerely,

Peter Costanti

Peter Costanti

cc: Jeff May

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OCT 29 2002

From:

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NOV 04 2002
STATE LANDS DIV

L6

COPY

October 15, 2002

To: William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Re: Comments Regarding Lake Whatcom PDEIS

Dear Mr. Wallace,

Thank you for this opportunity to comment on the Lake Whatcom PDEIS. DNR manages half of the Lake Whatcom watershed on behalf of the people of the State of Washington. We have a real opportunity to ensure clean water and safety from landslides for future generations through careful forest management. I urge you, and the Lake Whatcom Landscape Committee, to select for further study an alternative that provides the strongest protection for clean water and public safety in the Lake Whatcom watershed. Alternative 4 would be such an alternative. C1

The key to ensuring a safe and abundant drinking water supply is to protect streams, unstable slopes, and wetlands from logging and road construction. All of these areas, and other areas important to water quality, should have broad buffers at least 200 feet wide where no trees are cut. Outside these areas, where logging is appropriate, employing 200 year or more rotations, retaining a 70% canopy closure, and prohibiting road construction and chemical application in the watershed will ensure high water quality in our drinking supply for years to come. C2 silviculture

Lake Whatcom is the sole source of drinking water for more than 85,000 people. In 2000 the legislature recognized the importance of this lake for clean drinking water and public safety when they passed the Lake Whatcom Bill. Please move forward with the strongest possible protection of our drinking water supply. I urge you to select Alternative 4. C1a

Sincerely,

L4
Same as L5
COPY

From: Peter Costanti
4 Costanti Lane
Sedro-Woolley, WA 98284

October 15, 2002

To: William Wallace, DNR Northwest Regional Manager
SEPA Center, Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

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Sincerely,

Peter Costanti

cc: Jeff May

L8

COPY

From: Edward Halasz
2411 Lafayette Street
Bellingham, WA 98224

October 15, 2002

To: William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

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Sincerely,

Edward Halasz

L9

October 15, 2002

SEPA Center
Washington Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

Re: Lake Whatcom Landscape Management Plan PDEIS comments

I support the adoption of Alternative 1for the management of state forest lands in the Lake Whatcom Watershed. C1

The entire exercise of this review and the legislation requiring it is misguided and a huge waste of time and taxpayer money. The hand picked committee that developed the alternatives has absolutely no balance of representation and lacks the expertise to properly review the management of state forest lands. The committee's goal from the outset was to reduce the cut on state lands as much as possible if not totally eliminate it altogether. C2 process

State lands in the Whatcom Watershed are already more than adequately protected. The various protections include: The Lake Whatcom Watershed Analysis Management Prescriptions, the state Habitat Conservation Plan, and the Forest and Fish forest practices regulations. Unlike the landscape committee, these other protection/management rules did include interdisciplinary teams of scientific experts including foresters, hydrologists, geologists, fisheries biologists and the like from both the private and public sector. The HCP and Forest and Fish regulations were accepted by the U.S. Fish and Wildlife Service and the National Marine Fisheries Service as providing adequate protection for fish and wildlife species.

As numerous studies and the WA Dept. of Ecology have indicated, inappropriate development poses a larger threat to Lake Whatcom while forestry under current regulations and policies poses little risk to the Lake Whatcom Watershed. C3 H2O quality

We do not need to waste more taxpayer resources trying to reinvent the wheel to satisfy one-sided political objectives. I am strongly opposed to having my taxes needlessly increased to offset the revenue shortfall from stopping responsible forest management in the Lake Whatcom Watershed. If state lands cannot be managed for revenue production, then DNR must sell or trade the lands in order to satisfy the trust mandate. This could mean a more aggressive management approach by other parties who acquire these lands. C4 C5

I am a professional forester and a voting member of the Lake Whatcom Watershed Forestry Forum. The mission of this forum is to promote responsible forestry in the watershed as opposed to development. For the above reasons and more, this forum has voted to endorse Alternative 1 as the preferred alternative. C6

Thank you for the opportunity to comment.

Respectfully,

Aubrey J. Stargell

Aubrey J. Stargell
Forester
P.O. Box 161
Maple Falls, WA 98266

L10
same as L9

October 15, 2002

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SEPA Center
Washington Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

Re: Lake Whatcom Landscape Management Plan PDEIS comments

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Thank you for the opportunity to comment.

Respectfully,

Aubrey J. Stargell
Forester
P.O. Box 161
Maple Falls, WA 98266

L 11

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Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

With the five Alternatives presented, the Board of Natural Resources should be encouraged to stop and start over. A committee of experts in forest management and watershed management should be assembled to come up with a plan that has more flexibility, produces more revenue for the trusts, and continues the water quality protections already in place. The Alternatives presented do not accomplish this; they leave too narrow a range of choices from poor to bad. It seems obvious that the committee lacked enough professional expertise to do the job. The preferred alternative should be one that looks as close to number 1 as possible.

C1 process

Dee Young
111 Sauk Dan Dr.
Sidro-Woolley, Wa 98284

L12

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Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

The DOE and DOH reports show that water quality in Lake Whatcom will not be significantly impacted by forest management activities. With the protections already in place, it's time to maximize the returns to the trusts. The only Alternative that makes any sense and the only one that comes close to being reasonable management is Alternative 1. If this Alternative is not available a new one as close to it as possible should be written. C1

Gerald D. Ingram

4470 HALL RD.
BLAINE, WASH.
98230

LTS

same as U2

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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C1

Ken Dunland
1287 SE Camano Dr.
Camano Island, WA
98282

(L14)
same as L12

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Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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Rod L. Remington

Rod L. Remington
2929 Roeder Avenue
Bellingham, Washington
98225

L15
same as L12

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Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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Shawn K. Jones
415 N. State St. #404
Bellingham, WA.
98225

L16
same as L3

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

I do not agree with having only 5 Alternatives in the Lake Whatcom Plan when there are 7 Alternatives in the Sustained Yield Study.
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There needs to be an Alternative as close to number 1 as possible. With the watershed analysis plan, HCP, and now the forest and fish agreement there will be plenty of protection for the watershed. With these protections already in place, it's time to start managing these lands for the benefit of the trusts as well as protecting the water in the lake. C2

Sandra Maley
4401 Boblett Rd
Blaine, Wa 98230

(L17)

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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Linda Vernon
2013 Fowler Pl
Mt Vernon Wa
98274

L18

sam 3542

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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1111 DEER CREEK LANE
BELLINGHAM, WA 98226-9632

L 19

stme as L12

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10-14-02

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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Kathy Greenwood
1461 Farm Drive
Ferndale, WA 98248

L20

same as L3

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Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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John Abts

John Abts
2210 W. Birch
Bellingham, WA 98229

L21

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OCT 16 2002

STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

With the five Alternatives presented, the Board of Natural Resources should be encouraged to stop and start over. A committee of experts in forest management and watershed management should be assembled to come up with a plan that has more flexibility, produces more revenue for the trusts, and continues the water quality protections already in place. The Alternatives presented do not accomplish this; they leave too narrow a range of choices from poor to bad. It seems obvious that the committee lacked enough professional expertise to do the job. The preferred alternative should be one that looks as close to number 1 as possible.

C1 process

Steven L. McDonald
P.O. Box 2404
Blaine, WA 98231

L22
Same as L12

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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C

Ron Saunders
27957 Burmaster Rd
Sedro Woolley, Wa.

L23
Same as L3

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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3015 BENNETT DR.
BELLINGHAM, WA. 98225

L24

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STATE LANDS DIV

Dept. of Natural Resources
SEPA Center
P.O Box 47015
Olympia, WA 98504-7015

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Justine A. Blau
2447 Cedar Crt.
Custer, WA 98240

L25

FROM: Axel Schuessler, Ph.D. 513 East Alder Drive (Glenhaven)
Sedro Woolley, WA 98284
Tel. 360-595-2459

RECEIVED
OCT 18 2002
STATE LANDS DIV

Oct. 16, 2002

TO: William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

RE: Lake Whatcom PDEIS

Dear Mr. Wallace,

Living within the Lake Whatcom watershed, I am concerned about logging activity on the surrounding slopes, some of which are admittedly too steep for road construction and for logging without endangering public safety through landslides and harm to the water quality. I urge you therefore to adopt PDEIS Alternative 4. This provides relatively adequate protection: no roads and logging on potentially unstable slopes, no areal spraying of chemicals, etc. The estimated revenues are only marginally less than in Alternative 3, but Alternative 4 provides for considerably stronger protection of the water supply for close to 1000,000 people, of settlements in the watershed.

C1 silviculture + mass wasting + water quality

C2

When considering water quality, public safety to settlements and the environment, one must really deal with the Lake Whatcom watershed as a whole, it is indivisible regardless of diffused landownership and property rights. Adopting a strongly protective plan like no. 4 is therefore imperative since half or more of the watershed is in private hands and subject to unrestricted clearcutting anyway. To counterbalance this, Alternative 4 will hopefully help mitigate some of the adverse effects on water, residences and the environment which result from private logging activities.

C3

Thank you very much for soliciting and considering input from the affected public.

Sincerely,

A Schuessler

L26

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OCT 18 2002
STATE LANDS DIV

Oct. 16, 2002

To: William Wallace
SEPA CENTER
WASH. State DEPT of Natural Resources

RE: Comments Regarding Lake Whatcom PDEIS

Dear Mr. Wallace,

In reviewing the Alternatives concerning the Lake Whatcom Landscape Plan, I would strongly suggest Alternative #4! It is biologically sound. It would help protect our drinking water source. It would protect unstable slopes and streams and headwaters. The Alternative speaks for itself (#4), it speaks for the good of the citizens!

Thank you for your service

Paul Hansen

L27

2411 Franklin Street
Bellingham, WA 98225

October 17, 2002

William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

Re: Lake Whatcom PDEIS

We appreciate the opportunity to comment on the Lake Whatcom PDEIS. We understand that this is a very complicated issue that could result in both lost revenue and jobs for many people in our county. We believe that protecting Whatcom County's drinking water source is more important than these issues. Alternative 4 provides strong protection of this water source and although it will have consequences that are not ideal – we believe it best serves to protect our water in the Lake Whatcom Watershed and are confident that lost revenue and jobs can be resolved in other ways. 1

We urge DNR and the Lake Whatcom Landscape Committee to select Alternative 4.

Thank you,

David Harris

Mary Matyas

Mount Baker
SCHOOL DISTRICT

Tel: 360.383.2000
Fax: 360.383.2009
PO Box 95 • 4956 Deming Rd.
Deming, WA 98244-0095
www.mtbaker.wednet.edu

L28

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October 18, 2002

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SEPA Center
Washington State Department of Natural Resources
1111 Washington St. S.E., MS: 47015
Olympia, WA 98504-7015

RE: Public Input on the Lake Whatcom PDEIS

Dear Department of Natural Resources:

As a recipient of revenue from county transfer lands managed by the Department of Natural Resources in the Lake Whatcom watershed, Mount Baker School District is concerned about the financial impact of proposals included in the Lake Whatcom Landscape Plan PDEIS, September 13, 2002. The Department of Natural Resources has a legal obligation to the trust recipients to produce revenue on a long-term basis. Revenue generation should be maximized within the constraints of prudent, sustainable management. C1

Mount Baker School District urges the Board of Natural Resources to adopt Alternative 1 as the Lake Whatcom Landscape Plan. Alternative 1 is the only alternative that meets the trust revenue production obligations while providing appropriate environmental protections. The only quality that significantly differentiates the Lake Whatcom watershed from all other DNR-managed lands is the fact that Lake Whatcom serves as a municipal water supply. The November 15, 2001 letter from Megan White of Washington Department of Ecology included in the appendix to the PDEIS indicates quite clearly that standard Forest Practice Rules combined with the current watershed analysis prescriptions are sufficient protection for water quality in Lake Whatcom watershed. C2 C3

In evaluating the alternatives for the Lake Whatcom Landscape Plan, the Board of Natural Resources must balance legal requirements for environment protection with trust obligations. It has been argued that Alternative 1 of the PDEIS is in conflict with provisions of SB 6731 restricting new road construction. If the new road construction restrictions included in Senate Bill 6731 Sec. 1 (3) are interpreted to reduce revenue production to the extent outlined in Alternatives 2 through 5 of the PDEIS, then that interpretation would conflict with legal obligations to produce trust revenue. The restriction on new road construction would not provide any significant additional protection of water quality that is not already provided by current regulations. The potential revenue reductions of C4

L28

Alternatives 2 through 5 are too great to justify their adoption. If there is a conflict between laws, submit this issue back to the legislature.

The Lake Whatcom PDEIS gives inadequate attention to the revenue production obligations of the DNR. No financial impact statement is included. No consideration is given to a funding source and mechanism to reimburse Mount Baker School District for any future forgone income if Alternatives 2 though 5 are adopted. C5

As a school district our greatest concern is the impact on children. We currently have insufficient revenue to fund all that we should be doing. The revenue generated by county transfer land in Lake Whatcom watershed allows us to provide programs that make a real difference in children's lives. Don't trade our very real and important programs for environmental restrictions that would have no significant benefit to water quality. C6

On Behalf of the Mount Baker School District Board of Directors,

Ellen Dodson
President
Mount Baker School District Board of Directors

Russ Pfeiffer-Hoyt
Mount Baker School District School Director

L29

To: William Wallace, SEPA Center
Washington State Department of Natural Resources
1111 Washington Street S.E. - MS 47015
Olympia WA 98504-7015

From: Nancy Grayum
1356 Sudden Valley
Bellingham WA 98229

Re: Comments regarding Lake Whatcom PDEIS:
Alternative #4 should be recommended

Date: October 18, 2002

Dear Mr. Wallace,

The preliminary draft EIS for Lake Whatcom offers five alternatives for the Lake Whatcom Landscape Plan; I recommend that Alternative #4 be proposed and studied as the most viable alternative for the Draft EIS. C1

We must add increasing protections to the hydrology of the watershed that surrounds our precious drinking water reservoir. Alternative #4 provides some of the much-needed protection of streams, unstable slopes, and wetlands from logging and road construction. Buffers for all of these areas should be at least 200 feet where no trees are cut.

Alternative #4 leaves at least a 70% canopy closure and prohibits road construction, which causes hazards, increased flow, and sedimentation to pollute the waters in the basins. Water quality will be somewhat protected with the elimination of chemical application. Rotations should be at least 200 years so that a truly mature forest can filter and hold ground water in the way that keeps it vital and healthy.

Only Alternative #5 truly protects the drinking water reservoir for our community and future generations. The document for the Lake Whatcom Landscape Plan indicates that this alternative will not be considered without viable funding mechanisms associated with it. C2

Please understand that any damage to our drinking water supply will cost much more in the long haul than the pittance of revenue decrease proposed in Alternative #5. It only takes one disaster, one unusual event to bring our only source of drinking water to a tipping point at which there could be no return. Costs to citizens of our community, and to the State of Washington, will skyrocket with the need for increased treatment, either of the water or of people who may become ill from detrimental effects of logging the trees. If your agency cannot connect the dots on this point, then I will go ahead and concede that Alternative #4 is the only other acceptable proposal.

L30

RECEIVED
OCT 25 2002
STATE LANDS DIV

October 18, 2002

COPY

SEPA Center
Washington Department of Natural Resources
111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

After attending the Bellingham meeting on October 10, 2002, I would like to submit the following comments on the Lake Whatcom Preliminary Draft EIS. As life long resident of Whatcom County, a Certified forester with forest management experience in the watershed and as a forest landowner, I feel qualified to comment on this process. One thing very striking to me about most of the people attending the public meeting was their ignorance and lack of knowledge on forestry. The Landscape Committee also has no one with a forestry background and appears to advanced an agenda of "no logging period", no matter what the science says. To me this committee has little credibility in determining management of the state's forest trust lands. I also feel the legislation that started this process was done in haste to appease local legislators and should not be used as rules for municipal watersheds. C1 process

Another concern that I have is the way the five alternatives were presented. They were very biased against all of the research and work already accomplished for DNR management in the watershed, as represented by #1. If alternative 5 is an option, then alternative 1 should have been the biological growth capacity. The presented alternative 1 should really represent a middle of the road option and be represented as alternative 3. Any of the presented alternatives other than #1 gives the DNR very little flexibility to manage trust lands for the benefit of the trusts or the watershed ecosystem. Let me summarize my main points: C2

- The Legislation that started this process should be considered experimental and not a permanent blueprint for watershed management. C3
- A new committee should be formed that includes foresters and small forest landowners. I am concerned that any additional rules on State land will also be applied to private forest land owners. C4
- Alternative # 1 has already balanced environmental concerns with trust revenue generation in the Lake Whatcom Watershed. Watershed analysis, the HCP, and the new forest and fish rules guarantee ample safe guards for Lake Whatcom. C5
- Department of Ecology and Department of Health letters supported the present regulations as having have little impact on water quality in the watershed. Forest management should be the preferred land use. C6
- The best science and common sense should drive preferred alternatives and not groups of single issue activist. C7
- Leave plenty of flexibility in your management options for the future. You need to be able to adjust to unforeseen ecological changes in the future. C8

I strongly recommend that the DNR Forest Board redo the Lake Whatcom Landscape design process and initiate alternatives that consider trust responsibilities along with balancing watershed protection. C9

Sincerely,

Tom Westergreen

Joan Casey
1015 West Toledo Street
Bellingham, W 98229
1-360-647-2346
email: jcasey108@earthlink.net

October 19, 2002

William Wallace
DNR Northwest Regional Manager
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, Wa 98504-7015

RE: Lake Whatcom PDEIS

The following is an excerpt of a letter that I wrote to the Bellingham Herald, printed on 9/16/01 and copied to your office:

"More than 120 people, including two state legislators, five Bellingham City Council members and one Whatcom County Council member attended a meeting at Bloedel Donovan Park on Wednesday (1) about the Department of Natural Resource's Lake Whatcom Landscape Plan. All these people were there because they care about their community and their drinking water.

The citizen's comments seemed unanimous about:

1) The preservation of the quality of our drinking water;

2) The prevention of further degradation to the quality of that drinking water through logging, clear-cutting and road building.

3) ENVIORNMENTAL IMPACT STUDY BE CONDUCTED BY AN INDEPENDENT ORGANIZATION THAT DOES NOT HAVE A VESTED INTEREST IN THE OUTCOME and

4) Followed by a PEER REVIEW.

As one of our state representatives stated, it is essential that the citizens of this community be confident in the decisions that are made regarding our watershed."

Now, a year later there is a PDEIS done by the DNR and no PEER REVIEW.

The intent of the legislation S.B. 6731 was to develop a plan that would be acceptable to the community.

I have studied the PDEIS and studied the Revenue projections from the different alternatives. The revenue dollars seem very low to me and I would challenge the DNR to find another vehicle for creating these dollars. Let us look for a new revenue basis. We can not afford to be wrong about this important choice. I understand that it took over eight million dollars ($8,000,000) to clean up the 1983 landslide disaster. I would choose Alternative 4 if this was my only option. I would prefer to find an alternative to road building, logging and clear cutting in the Lake Whatcom watershed..

Thank you for your consideration.

Sincerely,

Joan Casey

Joan Casey

(1) This was the day after the 9/11 terrorist attack when everyone in this country was in shock and glued to their TV,s, yet the came to this meeting.

L32

COP

RECEIVED
OCT 29 2002
STATE LANDS DIV

October 19, 2002

To: William Wallace,
State Department of Natural Resources
SEPA COMMENT , Lake Whatcom PDEIS, MS:47015

Dear Mr. Wallace,

I'd like to comment on the Lake Whatcom PDEIS. I have followed this issue since the Austin Creek Sale. After reading through your PDEIS and discussing this issue with others, I am choosing alternative 4. I believe this will preserve Lake Whatcom. I strongly recommend alternative 4 as it eliminates the landslide risk to Public health and safety. I have always had a difficult time understanding how the state can weigh revenue against the health and well being of people and our water supply. When I saw the revenue documents at the meeting held by Linda Marrom and Lisa McShane, I really could'nt understand why harvesting this drinking water supply is such as issue. It's a municipal drinking water source for 85,000 people. Thank you for letting me comment.

C1

C2

Thank you,

Joey & Michelle Hurley

L33

COPY

Ellen
502 Sudden Valley
Bellingham, WA 98229
October 20, 2002

RECEIVED
OCT 29 2002
STATE LANDS DIV

William Wallace
EIS Planner
Washington State Department of Natural Resources
111 Washington Street, S.E.
MS: 47015
Olympia, WA 98504-7015

RE: Comment regarding Lake Whatcom DEIS

Dear Mr. Wallace:

Thank you for giving me this opportunity to express my concerns regarding DNR management of the forested lands in the Lake Whatcom watershed. I strongly urge the Lake Whatcom Landscape Committee to adopt Alternative Four. This is the only alternative which would help to protect our precious source of drinking water. Alternative Four would also help to maintain our fish and wildlife populations which are so important for a healthy ecosystem. C1 C2

I am very concerned about the effects of cutting trees and building roads on unstable slopes. Future damage caused by these activities could very well cost the DNR more money (especially when combined with lake cleanup costs) than the revenue created by harvesting. C3

I would like to emphasize that no chemical pesticides and insecticides be used in our watershed. My father is dying of cancer. I reside with him. This will be the third cancer death in five years in the immediate two blocks. We are only beginning to discover the effects of toxins in our water supply. Please don't allow the pain, agony and heartache to impact others. C4

I have researched all the alternatives and it is obvious to me that Alternative Three would generate a comparatively small increase in revenue when compared to Alternative Four. I do recommend that every stream be ensured a very large buffer area to protect fish and wildlife in addition to guaranteeing clean water. C5

We need the Landscape Committee to back up the intent of our State Legislature with the passage of ESSB 6731. What could be more important than the health of our citizens? Support Alternative Four for our children and our children's children.

Thank you for considering my input.

Del Lee

COPY

October 21, 2002

To: William Wallace,
SEPA Center
State Department of Natural Resources
Re: Public comment for Lake Whatcom PDEIS, MS:47015

Dear Mr. Wallace,

I would like to comment on the Lake Whatcom PDEIS. After attending you're your public scoping meetings for the past four years I am convinced that alternative 4 will allow the best protection for Lake Whatcom. You have made me aware of the unstable slopes surrounding our drinking water supply. I strongly recommend that you choose an alternative that fully minimizes the Public risk involved with landslides. Without a doubt, Public health and Safety should be your biggest concern. C1 C2

After reading your PDEIS document, I choose Alternative 4. I believe that maintaining old mature forests in our water supply will help stabilize the soils and produce a lower risk of landslides. I am for 200foot + buffers on all streams that flow into Lake Whatcom. I am for 200 year rotations as I realize the benefits of a mature old growth forest. My uncle is a forest hydrologist and he has taught me of these benefits.

I am against chemical application in a drinking water supply and I believe that the passage of SB 6731, which doesn't allow road construction on unstable slopes is of the highest priority to insure prevention of landslides. Your responsibility as stewards of our state lands is to insure that the citizens of the state are protected from disasters like landslides and it should be of top priority in a drinking water supply. This is why I picked Alternative 4. C3

Thank you,
Cindy Wallis

Cindy Wallis

L 35

October 21, 2002

Re: Lake Whatcom PDEIS

Dear Mr Wallace:

As a concerned citizen and resident of the Lake Watcom watershed. I urge you and the Lake Whatcom Landscape Committee to select Alternative 4.

We must start protecting our water supply NOW!!!! Only the strongest measure will work and that is Alternative 4.)C1

Thank you for your consideration,

George C. Ryker

Address: 628 Sudden Valley
Bellingham, WA 98229

(L 36)

Mount Baker
SCHOOL DISTRICT

Tel: 360.383.2000
Fax: 360.383.2009
PO Box 95 • 4956 Deming Rd.
Deming, WA 98244-0095
www.mtbaker.wednet.edu

COPY

RECEIVED
OCT 24 2002
STATE LANDS DIV

October 21, 2002

SEPA Center
Washington State Department of Natural Resources
1111 Washington Street S.E., M.S. 47015
Olympia, WA 98504-7015

RE: Public Input on the Lake Whatcom PDEIS

Dear DNR:

Please accept this letter as formal input on the *Draft Alternatives for a Landscape Plan Proposal* and the related *Preliminary Draft Environmental Impact Statement* (PDEIS). I am writing this letter as a concerned citizen and as the superintendent of Mount Baker School District. As the Department of Natural Resources (DNR) reviews the PDEIS, public input, and other information, I am sure that it will want to consider its obligation to manage Trust Lands in the interest of the children in our local communities, one of the Trust Lands most significant beneficiaries. The interests of our children can only be served if decisions are made with a balance of concerns for the environment, the economy, and specific revenue interests. C1

First and foremost, I urge the DNR to keep in mind its "legal duty to produce long-term income for specific trusts, which are the trust beneficiaries" as clearly stated in the PDEIS (p. 16, sec. 2.2). One of the primary purposes of the DNR is to manage the lands in a manner that will ensure the revenue generating capacity of the trust lands that it manages. Doug Sutherland states, "…much of [DNR managed] land is dedicated to supporting public institutions like schools… ." Additionally, the DNR makes the following statements (from the DNR website):

- ✓ "While all of the lands are managed to protect native fish and wildlife habitats, most are state trust lands, managed to earn money to help fund construction of public schools and universities, or fund local services - hospitals, libraries fire districts, school operations in many counties."

And:

- ✓ "Unlike many states, Washington kept most of its trust lands to provide a continuous flow of income to build public schools, universities, community colleges, prisons, state institutions such as mental hospitals, and Capitol buildings."

The PDEIS does a thorough job of analysis of the environmental impact of each of the five alternatives. Each alternative was evaluated for the impact it would

L36

have on the *Natural Environment* and the *Built Environment*. One subsection of the second category was the impact on Public Services and Utilities. Addressed in this subsection was the impact on the Common School Construction account. The fact that there will be a significant impact on revenue for local school districts is not addressed in this section or elsewhere in the report. Additionally, the approximate size of these impacts is not discussed. While it may be beyond the scope of an environmental impact statement, it is of critical importance that the DNR conduct a financial impact study to ensure that all consequences of each alternative be considered.

C2

Secondly, I want to address the overall implications of the general approach suggested by the PDEIS. The process considered the following categories of criteria:

- ✓ Ecological impact
- ✓ Tribal interests
- ✓ Revenue
- ✓ Community concerns

While these are certainly important areas that should have been studied, limiting the evaluation to these four areas is insufficient. It is clear (as stated above) that specific impact on trust land revenue must be considered. Also it is important that the DNR consider the following areas of concern in addition to the four that were studied:

C3

- ✓ General economic impact on the local community
- ✓ Other competing interests that impact water quality and could be controlled in through other action
- ✓ Alignment between the legislation that caused the PDEIS to occur and the purpose of DNR managed trust land
- ✓ Other legal implications of the proposed alternatives

Thank you for the opportunity to provide input to the EIS process. Please feel free to contact me if there is any additional information that you are interested in.

Respectfully,

Richard Gantman

Richard Gantman, Ed.D.
Superintendent
Mount Baker School District

L37

COPY

From:
Doti Leu
802 Sudden Valley
Bellingham, WA 98229
October 22, 2002

To:
William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street, S.E.
MS: 47015
Olympia, WA 98504-7015
RE: Comment regarding Lake Whatcom PDEIS

Dear Mr. Wallace:

I am vitally concerned about maintaining a clean water supply here in the Lake Whatcom watershed. Since the DNR manages 50% of the land in our watershed, careful forest management practices are crucial. I am also very concerned about the future impact on public safety from landslides caused by timber cutting and road building on unstable terrain. L1

I recommend that the Lake Whatcom Landscape Committee choose Alternative Four because this is definitely the best choice to guarantee our community a source of fresh, clean water. Alternative Four would not result in landslides, a very real threat to our homes, roads and bridges. Our valuable wetlands as well as L2

fish and wildlife would greatly benefit also.

I want to strongly emphasize that all steams should have extensive buffers with no cutting to preserve the quality of our water as well as fish habitat. Most importantly, I implore you to not clear cut, build no roads and use no chemicals.

The passage of ESSB 6731 in 2000 by our State Legislature is a vital affirmation of importance of Lake Whatcom to maintain public health. We are counting on the Lake Whatcom Landscape Committee to honor their committment to safeguard our health and safety. The difference in trust revenue generated between Alternatives Three and Four is most decidedly not worth the inherent risks involved to our community.

Myself, my family, my students and my neighbors thank you for protecting our health and safety by choosing Alternative Four.

Sincerely,
Dori Leu

L38

JAMES E. CATES
135 SUDDEN VALLEY
BELLINGHAM, WASHINGTON 98229-4802
PHONE: 360-738-9808

October 22, 2002

Mr. William Wallace,
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, Washington 98504-7015

Subject: Comments Regarding Lake Whatcom PDEIS

Dear Mr. Wallace:

Thank you for the opportunity to comment on the Lake Whatcom PDEIS. I understand the responsibilities DNR has in managing the Forest Board And Common School Trust lands. Also, I am sure you are aware that about half of the Lake Whatcom watershed is composed of these lands managed by DNR under these commitments.

The Lake Whatcom watershed is somewhat unique in that while it is the sole source of drinking water for more than 85,000 people, it is a comparably small watershed with no large tributaries and in a location proven to have multiple unstable slopes.

C1
C2

In addition, the Washington Department of Fish and Wildlife has concerns about the effects on various native fish and wildlife if riparian, aquatic and wetland ecosystems are disturbed.

The key to maintaining Lake Whatcom as a safe drinking water source as well as a healthy habitat for fish and wildlife is to protect the streams, the unstable slopes and the wetlands from the negative aspects of logging and road construction through careful forest management designed specifically for the circumstances unique to Lake Whatcom.

C3

Alternative 2 should be considered as the "bare minimum" approach to accomplishing these two objectives.

C4

However, again because of the unique circumstances of the Lake Whatcom watershed that require special

protection of streams, riparian areas, unstable slopes and wetlands, DNR needs to give a high priority to the aspects of forest management that best guarantee this will occur.

While it drastically affects the revenue potential of the DNR managed lands in the Lake Whatcom watershed, Alternative 5 does appear to provide the forest management provisions required to provide protection of our drinking water supply and the protection of the fish and wildlife habitats urged by the Washington Department of Fish and Wildlife. Therefore I should urge you to select Alternative 5.

However, recognizing that it is important that these lands remain as Forest Board and Common School Trust lands, I do urge you to select as many of the provisions in Alternative 4 that further define Alternative 2 to protect the Lake Whatcom watershed as discussed above and guarantee the lands will remain under DNR management.

Sincerely,

James E. Cates

DOUGLAS FIR HEMLOCK RED CEDAR

L39

COPY

EVERETT - (425) 258-2577
FAX (425) 259 - 6956

3812 - 28TH PLACE N.E.
EVERETT, WASHINGTON 98205-3290

SEPA CENTER / SDNR
1111 WASHINGTON ST. SE, MS: 47015
OLYMPIA, WA. 98504-7015

OCTOBER 22, 2002

RE: LAKE WHATCOM PDEIS

PLEASE ACCEPT THE FOLLOWING COMMENTS ON THE ABOVE NOTED DOCUMENT;

1. FORESTRY IS NOT THE PROBLEM IN THE LAKE WHATCOM WATERHED. IT IS BEING USED BY THE ENVIROMENT / NO-CUT GROUPS TO STOP TIMBER HARVEST. C1
2. ALL ALTERNATIVES EXCEPT # 1 VIOLATE THE SDNR'S TRUST MANDATE C2
3. REVENUE PROJECTIONS SEEM TO BE OPTEMISTIC. ALTERNATIVE # 2 WILL PROBABLY ONLY PRODUCE 1/3 OF # 1 AND #'S 3 & 4 WILL PRODUCE NONE. C3 TRUST REVENUE'S ARE AT STAKE AND ALL ALTERNATIVES NEED TO BE FIELD TESTED FOR OPERABILITY AND LOG VALUE. ONCE AN ALTERNATIVE IS PICKED AND REVENUES FALL SHORT THERE IS USUALLY NO WAY TO GO BACK AND FIX IT.
4. THE ADVISORY COMMITTEE IS MADE OF PUBLIC EMPLOYEES AND ENVIROMENTAL GROUPS. C4 NOT MUCH SCIENCE AND A LOT OF POLITICS.

THANK YOU

CHUCK PARKER
TIMBER MANAGER
BUSE TIMBER & SALES

L40

October 22, 2002

To: William Wallace,
State Department of Natural Resources
Re: Comment for Lake Whatcom PDEIS, MS:47015

Dear Mr. Wallace,

I'd like to take the opportunity to comment on the Lake Whatcom PDEIS. I have attended every meeting about this issue since 1998. After looking through your PDEIS and discussing this issue with my neighbors, one being a geologist, I am choosing alternative 4. I believe this will allow the best protection for Lake Whatcom. I strongly recommend alternative 4 as it fully minimizes the Public health and safety risk involved with landslides. I have always believed our health and public safety should take precedence over trust revenue. C1

Alternative 4 allows the potential for an old forest, the fullest protection of streams and as you state in your PDEIS, will further eliminate the risk of landslides. I am for the passage of SB 6731. I believe our legislators want this landscape plan to be acceptable to our community, regardless of trust income. C2

Thank you,

Jamie Berg

L41

COPY

October 23, 2002
To: William Wallace,
State Department of Natural Resources
SEPA, Lake Whatcom PDEIS

Mr. Wallace:

I'm sending you a comment on the Lake Whatcom PDEIS. I have followed this issue for many years and I am grateful that you are allowing The Lake Whatcom Landscape Committee to do the work they're doing for this upcoming harvest plan. After carefully looking over all the alternatives, I am choosing alternative 4. This is without a doubt the most protective alternative, and it will still allow you to manage these lands. C1

The revenue is inconsequential to me, as I believe the quality of the plan sets well above the need for trust revenue from a drinking water supply. I hope to see a risk analysis in the upcoming draft. I don't believe the constitutional laws that mandate harvesting of these lands intended you to risk jeopardizing drinking water and public safety. C2 C3

I've learned from your meetings that the majority of land in the watershed is unstable. Therefore, alternative 4 seems to best protect the unstable areas, the streams and wetlands to the fullest potential. The forests surrounding Lake Whatcom deserve to be managed with the fullest protection in mind. C4

I saw the Trust revenue print out handed out at the last meeting I attended, and the loss of revenue does not seem significant, since the numbers are so small. I heard the 1983 flood cost 8 million dollars to clean up. C5

The benefits of a mature forest, with sufficient buffer protection and no clear-cutting or chemical spraying are worth their weight in gold. C6

Sincerely,
Lita Wallis
Lita Wallis

L42

same as LM1

October 23, 2002

To: William Wallace,
State Department of Natural Resources
SEPA , Lake Whatcom PDEIS

Dear Mr. Wallace,

I'm writing to comment on the Lake Whatcom PDEIS. I have followed this issue for many years and I am grateful that you are allowing The Lake Whatcom Landscape Committee to do the work they're doing for this upcoming harvest plan. After carefully looking over all the alternatives, I am choosing alternative 4. This is without a doubt the most protective alternative, and it will still allow you to manage these lands.

The revenue is inconsequential to me, as I believe the quality of the plan sets well above the need for trust revenue from a drinking water supply. I hope to see a risk analysys in the upcoming draft. I don't believe the constitutional laws that mandate harvesting of these lands intended you to risk jeopardizing drinking water and public safety.

I've learned from your meetings that the majority of land in the watershed is unstable. Therefore, alternative 4 seems to best protect the unstable areas, the streams and wetlands to the fullest potential. The forests surrounding Lake Whatcom deserve to be managed with the fullest protection in mind.

I saw the Trust revenue print out handed out at the last meeting I attended, and the loss of revenue does not seem near as important , since the numbers are so small. I heard the 1983 flood cost 8 million dollars to clean up.

The benefits of a mature forest, with sufficient buffer protection and no clear-cutting or chemical spraying are worth their weight in gold.

Sincerely,
Lisa Stevenson

Lisa Stevenson

COPY

(L43)

Lois Garlick
3014 Lynn St.
Bellingham, WA 98225
October 23, 02

RECEIVED
OCT 29 2002
ASSET MANAGEMENT
& PROTECTION DIVISION

SEPA center@WADNR.gov
P.O.Box 47915
Olympia, WA 98504-7015

File #02-091300

I am writing in support of Alternative #five.

Our first consideration should be protection and preservation of the drinking water supply for the city of Bellingham and beyond. To this end, there should be no timber sales on state lands in a water shed that effects the drinking water supply for 80,000 people, for anytime in the future. These lands should be managed as a "watershed preserve". Clean water is going to be the common denominator for all sustenance on this planet, and short term thinking which doesn't factor this in will be disastrous. Cease the cutting of timber in the watershed and drinking water will increase in quantity and improve in quality. Water is probably the most valuable natural resource we have and why is no one, including the DNR, recognizing its monetary value? The price of clean , potable water is worth more in return than board feet of lumber ever could be. C1 C2

The Department of Natural Resources has got to recognize other roles besides timber production--mainly wildlife, recreation, salmon species health--and get over the idea that they are just a logging company. When the state was young and trees were so thick the farmers had to "get rid of them" to plant crops timber production appeared to be a viable source of revenue, but let's face it--all that is left now, is second growth forests and population and schools have outstripped ability of the DNR to finance their "trusts" with trees alone. C3

The Department of Natural Resources should not be trying to grow any trees as a crop on steep slopes. Success of growing Poplars on lowland is a good indication of how tree farming should be carried on. You don't see farmers planting corn on steep and mountainous slopes. There are, in Whatcom county, hundreds of acres of marginal farm land being squandered as 5 acre lots for housing--THIS is where the tree planting should be taking place. Commercial crops of soft woods should be carried on in the lower, flatter country where harvesting would be simpler and cheaper. C4 C5

We will have an ecological diverse stand , automatically, if we don't log and let the forests grow back. The trouble with clear cutting is that it removes everything and destroys, suddenly and for a long period of time,the forest duff that has been 100's of years in the making. True, the trees grow back and the landscape "greens" up but there is something lost each time the trees are clear cut and so suddenly bares the ground . This is also devastating to the wildlife as well as plant life. Restoration and maintenance of high quality fish and wildlife habitat, water quality and soil productivity--this all would be taken care of when the forest is left to maintain itself. In fact, the DNR could be abolished as far as their "timber production" role is concerned, for that is what they have evolved into--timber producers. C6

Paper should not be made from wood pulp , at least not solely from Douglas Fir.. There are other crops that are better suited for growing for paper production, less C7

L43

Lois Garlick
3014 Lynn St.
Bellingham, WA 98225
October 23, 02

detrimental to soil upon harvesting, less expensive to grow and not as long a crop rotation.

The Department of Natural Resources should look elsewhere for sources of income than doggedly pursuing the last tree to come out of a watershed. True, there are repeater sites that generate some income but instead of using roads they should be required to access their sites by helecopter for maintenance. If there are roads, there will be wheeled vehicles and they are hard to control. C8

For income, trees should be grown where harvesting is cheaper and damage to soil lessened. Lowland tree farming makes it easier to fertilize, control pests and harvest. The importace of old growth forests and their role in carbon sequestration in the watershed should not be overlooked. C9

Improvement in "visual impact" will be almost immediate if the trees are left to mature beyond the onslaught of a 40 or 60 year cutting cycle and the soil allowed to heal its wounds. More importantly, this will allay some of the flooding problems by stabilizing the run-off. C10

The tribal role should be completely compatible with this plan because their lifestyle does not require roads. They are competent on trails for accessing their accustomed tribal haunts the same as their ancestors did. If the trees are allowed to regenerate at their natural, undisturbed pace the tribes will also find the abundance of native plants, roots and herbs that their ancestors enjoyed. It can only be a winning alternatiave for everyone concerned, including the Department of Natural Resources. If the DNR continues on its present course--ie. Alternative one--they are headed for extinction. C11 C12

Lois Garlick

L44

October 24, 2002

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OCT 28 2002
STATE LANDS DI

COPY

William Wallace
SEPA Center
Washington State Dept of Natural Resources
1111 Washington
MS: 47015
Olympia, WA. 98504-7015

Dear Mr. Wallace:

I recommend that the Lake Whatcoom Landscape Committee select Alternative Four.

This alternative would prevent costly landslides caused by timber cutting. I well remember the terrible damage caused to our "Valley" by 2 previous landslides about 13 years ago

Thank you

Donald J. Lee
[redacted] 52 N. Point Drive (802 Sudden Valley)
Bellingham, WA 98229

 L45

October 24, 2002

To: William Wallace, State Department of Natural Resources
SEPA COMMENT, Lake Whatcom PDEIS

Dear Mr. Wallace,

Thank you for allowing me to comment on letting me the Lake Whatcom Landscape Plan PDEIS. I have read through your lengthy document as best as I could, and I am convinced that alternative 4 is the choice I want.The forests surrounding Lake Whatcom need the fullest protection available. I believe harvesting under the guidelines of alternative 4 will prevent the onset of landslides and preserve our drinking water supply. C1

I have read other forestry materials that emphasize the importance of an old mature forest, especially with regards to preventing landslides. The larger the buffers on wetlands,streams, and unstable areas the better. That only makes sense C2

Trust revenue is necessary in this state, but not when it jeopardizes public health and safety. I thank God for the people who recognized this issue back with the Austin Creek sale. I believe seeking legislation and changing forest practice rules in our drinking watershed was wanted by nearly everyone in this community. -3

Our Watershed is prone to rain on snow events. Road construction on unstable slopes is probably the riskiest venture that you could do in a municipal drinking water source for 85,000 people. The strongest protection available should be considered by the state, as it is your responsibility to insure we have clean drinking water and safe communities. C4

Sincerely,

Randy Stevenson

Randall Stevenson

(L46)

Brian Wilmot
102 Briza Court
Bellingham,WA 98229

COPY

William Wallace, DNR Northwest Regional Manager
SPEA Center, Washington State Department of Natural Resources
1111Washington Street SE
MS:47015
Olympia, WA 98504-7015

October 25, 2002

Re: Lake Whatcom PDEIS

Mr. Wallace:

I am writing in support of Alternative 5 of the Lake Whatcom Landscape Plan. Clean Water, a basic human need, should take precedence over the funding of public institutions, and Alternative 5 accomplishes this directly. The geological and hydrological condition of the Whatcom watershed are such that logging on this land will result in serious erosion and possible landslides due to the unstable slopes resulting in the fouling of our drinking water sources, destruction of salmon habitat and serious damage to private and public property. C1

I encourage the decision makers in the Department of Natural Resources to expand their focus in regards to the use of public timberlands to include clean water, quality recreation and wildlife habitat. Whatcom County is willing to forgo revenue received from logging this land to ensure it's citizens clean drinking water, so I hope the DNR would not be obstructionist. Where would you place clean drinking water on your list of priorities? C2

Public health and safety requires that this watershed be protected and I urge you to support Alternative 5 of the PDEIS.

Sincerely,

Brian Wilmot

Brian Wilmot

L47
Same as L46
COPY

Susan M. Tercek
102 Briza Court
Bellingham, WA 98229

William Wallace, DNR Northwest Regional Manager
SPEA Center, Washington State Department of Natural Resources
1111Washington Street SE
MS:47015
Olympia, WA 98504-7015

October 25, 2002

Re: Lake Whatcom PDEIS

Mr. Wallace:

I am writing in support of Alternative 5 of the Lake Whatcom Landscape Plan. Clean Water, a basic human need, should take precedence over the funding of public institutions, and Alternative 5 accomplishes this directly. The geological and hydrological condition of the Whatcom watershed are such that logging on this land will result in serious erosion and possible landslides due to the unstable slopes resulting in the fouling of our drinking water sources, destruction of salmon habitat and serious damage to private and public property.

I encourage the decision makers in the Department of Natural Resources to expand their focus in regards to the use of public timberlands to include clean water, quality recreation and wildlife habitat. Whatcom County is willing to forgo revenue received from logging this land to ensure it's citizens clean drinking water, so I hope the DNR would not be obstructionist. Where would you place clean drinking water on your list of priorities?

Public health and safety requires that this watershed be protected and I urge you to support Alternative 5 of the PDEIS.

Sincerely,

Susan M. Tercek

L48

COPY Same as L46

Michael Menard
102 Briza Court
Bellingham, WA 98229

William Wallace, DNR Northwest Regional Manager
SPEA Center, Washington State Department of Natural Resources
1111Washington Street SE
MS:47015
Olympia, WA 98504-7015

October 25, 2002

Re: Lake Whatcom PDEIS

Mr. Wallace:

I am writing in support of Alternative 5 of the Lake Whatcom Landscape Plan. Clean Water, a basic human need, should take precedence over the funding of public institutions, and Alternative 5 accomplishes this directly. The geological and hydrological condition of the Whatcom watershed are such that logging on this land will result in serious erosion and possible landslides due to the unstable slopes resulting in the fouling of our drinking water sources, destruction of salmon habitat and serious damage to private and public property.

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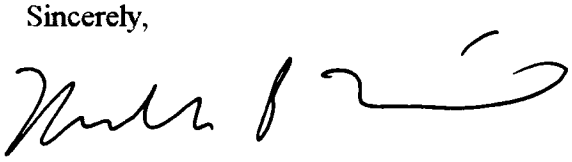
Public health and safety requires that this watershed be protected and I urge you to support Alternative 5 of the PDEIS.

Sincerely,



Michael Menard

L49

Working Together for Lake Whatcom

COPY

Mark Asmundson, Mayor
City of Bellingham
210 Lottie Street
Bellingham, WA 98225
(360) 676-6979

Pete Kremen, Executive
Whatcom County
County Courthouse
Bellingham, WA 98225
(360) 676-6717

Deborah Lambert, Commissioner
Whatcom County Water District #10
1010 Lakeview Street
Bellingham, WA 98226
(360) 734-9224

MEMORANDUM

TO: SEPA Center
Washington State Department of Natural Resources
FROM: Lake Whatcom Management Committee
DATE: October 25, 2002
RE: Comments on the Lake Whatcom PDEIS

The City of Bellingham, Whatcom County and Whatcom County Water District #10 (WD# 10) have formally agreed to work together in the management of their jurisdictional interests in the Lake Whatcom Watershed. The Lake Whatcom Management Committee (LWMC) is the decision-making entity for that cooperative effort. Staff and the Forestry Forum (a committee empowered by the LWMC) have reviewed the Lake Whatcom Preliminary Draft EIS of September 13, 2002. The following comments are based on that review.

The primary concern of the LWMC is protection of the Lake's water quality especially as that pertains to the municipal water supply of Bellingham and WD #10. In consideration of that focus, the LWMC requests that the Draft EIS include a comparison of the water quality impacts of each alternative, not only the sediment load contributions but also the effects of chemical application. In addition, other activities with water quality impacts identified during the development of alternatives should be included in the comparison. C1

This comparison should be presented in the form of a benefit/cost analysis of each alternative's impact on water quality. The benefit/cost analysis should take into account additional costs for maintaining the drinking water supply, including but not necessarily limited to costs associated with treatment at the water treatment plant. The LWMC feels that this analysis will aid them in recommending a preferred alternative for consideration in the EIS.

The LWMC is primarily responsible for maintaining Lake Whatcom as a safe water supply. However, the LWMC recognizes the importance of commercial forestry to the local economy. Further, it supports the industry's efforts to be viable while continuing practices that protect the environment and water quality. To this end, the LWMC is looking for an alternative that achieves both viable forestry and water quality protection. C2

c Committee Members
Ward Nelson, Whatcom County Council
John Watts, Bellingham City Council

Charles & Charlene Law
1514 Sudden Valley
Bellingham, Washington 98229

LSO

COPY

RECEIVED
OCT 29 2002
STATE LANDS DIV

October 25, 2002

William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Re: Comments Regarding Lake Whatcom PDEIS

Dear Mr. Wallace,

After attending meetings on the logging alternatives set forth by the Department of Natural Resources, I have no other recourse but to plead for Alternative 5.
Coming from the Midwest, I know the value of fresh drinking water and the cost to keep it safe for our children and grandchildren.
We have mismanaged so much of our natural resources in the past.
Let us not mismanage our precious water here in the Northwest.
Protect our water and select Alternative 5.

C 1

Sincerely,

C Charlene Law

(L51)

COPY

Robin Ireland

1200 Sudden Valley
Bellingham, Washington 98229
Phone & Fax: 360/647-7036
E-mail: robin@robinireland.com
www.robinireland.com

October 25, 2002

William Wallace
Northwest Regional Manager
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS: 47015
Olympia, WA 98504-7015

RE: Lake Whatcom PDEIS

Dear Mr. Wallace:

As a long-time resident of Sudden Valley, I appreciate the opportunity to offer feedback on the alternatives currently up for review regarding logging in the Lake Whatcom watershed area. I want to go on record as to which alternative I would urge you to consider.

In looking at the five proposed, the first two would seem untenable due to the disregard they show for the health of both the physical environment and what is the drinking water source for no small number of people in Whatcom County. Alternatives 3 and 4, are similar in many respects. They both offer the appropriate consideration for the environment, the county's drinking water supply, and the safety of life and property in the area. Their chief difference, however, lies in the length of the logging cycle proposed. In that respect, Alternative 4, I feel, is somewhat too severe on the DNR. The timber that stands now is 100-year growth, and that would seem far more reasonable a cycle than Alternative 4's proposed 200-year cycle.

C1
C2
C3

Therefore, in conclusion, I respectfully request you consider selecting Alternative 3 for further study.

Best regards,

Robin Ireland
Sudden Valley resident

L52

COPY

COUNCILMEMBER LAURIE CASKEY-SCHREIBER

October 25, 2002

Mr. William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS – 47015
Olympia, WA 98504-7015

Re: **Comments Regarding Lake Whatcom PDEIS**

Dear Mr. Wallace: (BILL)

I wanted to utilize this opportunity for comment taking, to express my thoughts regarding the proposed alternatives listed in the PDEIS for Lake Whatcom.

I have spoken to several constituents regarding their thoughts and preferences pertaining to the DNR's PDEIS, and there seems to be an overwhelming preference for Alternative four. I too feel that is our only viable choice if we truly consider what's best for the people of Whatcom County. As you are well aware, Lake Whatcom is the county's largest source of potable water, and it is imperative that we ensure the well-being of this reservoir, now and for future generations. C 1

The geography of Lake Whatcom is also rather precarious when it comes to slope stability, therefore we would urge you to proceed with great caution regarding the use of new roads, clear-cuttting, and any hazardous chemicals that may end up leaching or flowing into Lake Whatcom. There won't be an opportunity to "fix" something, if any one of these issues occurs. The results could be detrimental to people and or water quality. C 2

I feel it's also important to recognize and remember the intent of ESSB 6731, when considering the alternatives. Clearly, alternative four would respect the spirit of ESSB 6731, and it is the best option for meeting your needs and the needs of the citizen's of Whatcom County. Thank you for your earnest consideration. C 3

Sincerely,

Laurie Caskey-Schreiber

Laurie Caskey-Schreiber
Whatcom County Councilmember
311 Grand Avenue, Suite 105
Bellingham, WA 98225-4038

L53

October 25, 2002

To: William Wallace,
State Department of Natural Resources
Lake Whatcom PDEIS

Dear Mr. Wallace:

Thank you for letting me comment on the Lake Whatcom Landscape Planning process. I'd like to thank the DNR and The Lake Whatcom Landscape Committee for all the work they have done on this process. After carefully looking over all the alternatives, I am choosing alternative 4.

I truly believe this alternative will afford the utmost protection necessary to insure preservation of our drinking water. I also believe it will greatly reduce the risk for serious landslides that could jeopardize public health and safety. That is the absolute most important factor in all the monetary and environmental factors you're analyzing. C1

The benefits of mature forest hydrology are important to water quality and soil stability. Especially on lands as unstable as those in the Lake Whatcom Watershed. I've read various other documents in which the science points to eliminating clear-cutting and having a diverse forest with varied ages of timber, along with well protected streams and wetlands. C2

Alternative 4 will accomplish this. This will also accomplish the community goal of preserving Lake Whatcom for future generations. As a citizen who relies on Lake Whatcom as our drinking water supply, I hope you choose alternative 4, as I believe we will then accomplish a sustainable prudent harvest plan.

Sincerely,
Ed and Sue Abts

Sue Abts

L54

COPY

October 25, 2002

RECEIVED
OCT 29 2002
STATE LANDS DIV

To: William Wallace,
SEPA Department
State Department of Natural Resources
Lake Whatcom PDEIS

Dear Mr. Wallace:

I'd like to comment on the Lake Whatcom Landscape Planning PDEIS. Thanks to you and The Lake Whatcom Landscape Committee there has been much work done on this issue.

I truly believe that alternative 4 is the best choice for this landscape plan. Alternative 4 will allow the best protection for our municipal drinking water supply. I t will greatly reduce the serious risk of rain and snow events and inherent landslides. There has to be a precedent above and beyond all else for public health and safety. C1

Mature forest hydrology is crucial to forest health, soil stability and water quality. Especially since the lands in the Lake Whatcom watershed are unstable. Eliminating clear-cutting and allowing the forest to mature, along with insuring well buffered streams will give the forests around Lake Whatcom a chance to be stable and healthy. C2
Over 85,000 people rely on Lake Whatcom for their water source. Please be prudent in your decision to harvest the 15,000 acres of state trust land in our drinking water supply.

Thank you,
Terry and Laurie Justin

Terry Justin Laurie Justin

L55

COPY

1405 Undine St.,
Bellingham, WA 98229
October 26, 2002

To: William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Re: **Comments Regarding Lake Whatcom PDEIS**

Dear Mr. Wallace,

I appreciate this opportunity to comment on the Lake Whatcom PDEIS. With this PDEIS, there is an opportunity to ensure that the water we drink will maintain it's quality and the land around some of the lake will remain stable. I urge you, and the Lake Whatcom Landscape Committee, to select for further study **Alternative 4** that is fully protective of clean water and public safety in the Lake Whatcom watershed. C1

Your PDEIS Executive Summary states that to fully prevent rain-on-snow events, Alternative 3 is the best choice. With as little as a few thousand dollars difference between the Alternatives, I believe that **Alternative 4** is a much more prudent choice, especially if there is even the slightest possibility of land slides. For goodness sakes, our water supply and people's safety are at risk in this process. **Alternative 4** is the responsible and ethical choice. C2

Our forests are so important to all of us in that they provide us with fresh, clean water. The streams, unstable slopes and wetlands, all should have buffers where no trees are cut. Please choose to limit potential impacts to our water quality: no new roads, no clearcuts, no chemicals. Let the old growth forest develop for future generations to enjoy. C3

Lake Whatcom is the sole source of drinking water for more than 85,000 people. In 2000, the legislature recognized the importance of this lake for clean drinking water and public safety when they passed ESSB6731. Please move forward with protection of the lake. It's the only Lake Whatcom we have. I urge you to select **Alternative 4**. C4

Sincerely,

Anne Zuk

Anne Zuk - Very Concerned Citizen

@

L56
same as L57

COPY

1405 Undine St.,
Bellingham, WA 98229
October 26, 2002

To: William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Re: **Comments Regarding Lake Whatcom PDEIS**

Dear Mr. Wallace,

Thank you for this opportunity to comment on the Lake Whatcom PDEIS. DNR manages these lands, half of the Lake Whatcom watershed, on behalf of the people of the State of Washington. With this PDEIS, there is an opportunity to ensure clean water and safety from landslides for future generations through managing this forest with the utmost care. I urge you, and the Lake Whatcom Landscape Committee, to select for further study **Alternative 4** that is fully protective of clean water and public safety in the Lake Whatcom watershed.

In your PDEIS Executive Summary, you state that to fully prevent rain-on-snow events, Alternative 3 is the best choice. After reading the economical impact report and seeing that there is only a few thousand dollars difference between the Alternatives, it seems much more prudent to go with **Alternative 4**, especially if there is the slightest danger of injuring humans in the process. **Alternative 4** will further minimize the risk to safety and our precious water supply.

Our forests are so important to all of us in that they provide us with fresh, clean water. The streams, unstable slopes and wetlands, all should have buffers where no trees are cut. Please choose to limit potential impacts to our water quality: no new roads, no clearcuts, no chemicals. Let the old growth forest develop for future generations to enjoy.

Lake Whatcom is the sole source of drinking water for more than 85,000 people. In 2000, the legislature recognized the importance of this lake for clean drinking water and public safety when they passed ESSB6731. Please move forward with protection of the lake. It's the only Lake Whatcom we have. I urge you to select **Alternative 4**.

Sincerely,

George Zuk - Very Concerned Citizen

L57

COPY

same as L52

COUNCILMEMBER LAURIE CASKEY-SCHREIBER

October 25, 2002

Mr. William Wallace
SEPA Center
Washington State Department of Natural Resources
1111 Washington Street SE
MS - 47015
Olympia, WA 98504-7015

Re: **Comments Regarding Lake Whatcom PDEIS**

Dear Mr. Wallace: (BILL)

I wanted to utilize this opportunity for comment taking, to express my thoughts regarding the proposed alternatives listed in the PDEIS for Lake Whatcom.

I have spoken to several constituents regarding their thoughts and preferences pertaining to the DNR's PDEIS, and there seems to be an overwhelming preference for Alternative four. I too feel that is our only viable choice if we truly consider what's best for the people of Whatcom County. As you are well aware, Lake Whatcom is the county's largest source of potable water, and it is imperative that we ensure the well-being of this reservoir, now and for future generations.

The geography of Lake Whatcom is also rather precarious when it comes to slope stability, therefore we would urge you to proceed with great caution regarding the use of new roads, clear-cuttting, and any hazardous chemicals that may end up leaching or flowing into Lake Whatcom. There won't be an opportunity to "fix" something, if any one of these issues occurs. The results could be detrimental to people and or water quality.

I feel it's also important to recognize and remember the intent of ESSB 6731, when considering the alternatives. Clearly, alternative four would respect the spirit of ESSB 6731, and it is the best option for meeting your needs and the needs of the citizen's of Whatcom County. Thank you for your earnest consideration.

Sincerely,

Laurie Caskey-Schreiber

Laurie Caskey-Schreiber
Whatcom County Councilmember
311 Grand Avenue, Suite 105
Bellingham, WA 98225-4038

L58

COPY

State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

October 28, 2002

Mr. William Wallace
SEPA Responsible Official
Department of Natural Resources
SEPA Center
Lake Whatcom PDEIS
1111 Washington St. SE
Post Office Box 4-7015
Olympia, Washington 98504-7015

Dear Mr. Wallace:

The following are comments from the Washington Department of Fish and Wildlife regarding the Preliminary Draft EIS for the Lake Whatcom Landscape Plan. Thank you for the opportunity to provide extended scoping comments. Our comments are directed at SEPA-related technical issues. We will reserve identification of our favored alternative until later in the decision-making process. I understand that Area Habitat Biologist Alan Loof has been involved extensively as a member of the Lake Whatcom Landscape Planning Committee. We appreciate participating in the ongoing dialogue on how to solve these important resource management issues. General comments are described first, followed by our specific comments organized by reference to pages in the PDEIS.

General Comments

1. *Landscape definition.* We request that the DEIS evaluate and compare vegetative, wildlife, and fisheries impacts with respect to the entire watershed, adjacent landscapes, and the larger scale landscape perspective. WDFW previously submitted this comment to the DNR in the our initial scoping comment letter dated September 28, 2001. Many species, such as bears and marbled murrelets, typically have home ranges that are larger than scale used for the landscape analysis in the PDEIS. In addition, a relatively high-relief, mostly forested migration corridor extends from Bellingham/Chuckanut Bay to Mount Baker. The corridor includes the Chuckanut Ridge/Blanchard Mountain area and the southern two-thirds of the Lake Whatcom watershed. This one of the few, if only, such mountainous areas that extends to the marine coast on the east side of Puget Sound, and offers a unique opportunity to provide and support unique wildlife and wildlife habitat so close to developing urban areas.

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2. *Baseline alternative.* The use of Alternative 1 as the baseline condition for the EIS may not be appropriate under SEPA rules. Discussions with the WDFW SEPA official in Olympia indicates that the baseline condition should probably be the alternative that reflects the laws and actual field practices that were in effect at the time of initiation of the EIS.

3. *References.* The PDEIS does not include any references to the Washington Department of Fish and Wildlife Priority Habitats and Species publications. These documents include extensive literature reviews and management recommendations for managing riparian, fish, and wildlife resources using some of the best available science. These and other document references were submitted by WDFW in the scoping comment letter for inclusion in the EIS analysis process. Only two of the thirteen documents in the WDFW scoping comment letter are listed as references in the PDEIS (FEMAT and the Lake Whatcom Watershed Analysis). We request that this material be incorporated into the analysis of alternatives in the DEIS.

4. *Mass Wasting.* Alternative 1 fails to include important provisions to protect aquatic resources from mass-wasting events. Mass-wasting events are often a primary contributor to sediment in streams on steep terrain (Furniss et al. 1991). Roads located on unstable slopes have been documented to increase the frequency slope failure by 30-300 times (Sidle et al. 1985). Additionally, road-associated mass failures can persist for decades (Furniss et al. 1991).

Alternative 1 will merely "consider" the recommendations of specialists regarding unstable slopes. No discussion is provided to support protection of aquatic resources from road maintenance, placement of sidecasts, or alteration of subsurface water patterns on unstable slopes, all of which are common contributors to slope failure (Wolfe 1982). The risk to aquatic resources from road-related slope failures is substantial. The effect of slope failure on aquatic resources under Alternative 1 is underestimated.

Alternatives 2-5 appear to provide increased aquatic resource protection from management activities. However, some statements are ambiguous. For example, the relationship between recommendations of the inter-jurisdictional committee and DNR actions in not clear. Would DNR be obligated to follow the committees' recommendations in Alternative 2? In addition, Alternatives 3 and 4 state that road construction *will* not occur on unstable slopes, then say that road construction *should* not occur on unstable slopes. We recommend that these ambiguities are made clear in the DEIS.

5. *Roads and Sediments.* The effect of sedimentation from orphaned roads on aquatic resources can be substantial. Obviously, routine maintenance to prevent catastrophic failure of stream crossings occurs less often than on used roads. Although alternatives 1 and 2 include an assessment, they do not include provisions that repair or abandon orphan roads that are risks to aquatic resources. Alternative 3 provides an acceptable means to address this risk. We recommend that Alternative 2 also include provisions to repair or abandon orphaned roads.

L58

6. *RMZs.* In fish streams, alternatives 1 and 2 provide riparian buffers as described in DNR's HCP. However, harvest is allowed in these alternatives under guidelines that are still under development. Under these alternatives, it is unclear how riparian functions and aquatic resources will be protected. C9

Provisions that limit sediment-producing yarding activities – even on non-fish streams – significantly increase the protection for aquatic resources. We recommend inclusion of such provisions as part of Alternatives 2-4. C10

Silviculture to restore older forest conditions can be beneficial to both fish and wildlife species in cases where hardwoods have replaced conifers and where riparian ecosystems are currently comprised of young, densely stocked stands. We recommend using an adaptive management approach to experiment with and monitor the results of restoration silviculture in RMZs as part of alternatives 2-4. C11

Specific Comments

1. *First Landscape Committee (page 22).* The PDEIS should include additional discussion concerning the recommendations made by the first landscape committee and the DNR response to those recommendations. The DNR response prompted local citizens to seek additional legislation (ESSSB 6731) for the planning process. These documents (Report of the Lake Whatcom Advisory Committee to the Commissioner of Public Lands, December 13, 1999 and Appendix 2: Lake Whatcom Advisory Committee Recommendations and DNR Response) should also be incorporated into the Appendix in their entirety. C12

2. *Continuing role of the Landscape Committee (page 23).* The PDEIS should mention the function of the landscape committee to make site-specific recommendations following adoption of the final landscape plan. Although this fact is mentioned elsewhere in the document, the importance of this component to the long-term landscape process would be appropriate in this section. C13

3. *Hardwood stands (page 72).* It is unclear how DNR intends to manage for hardwood stands in Lake Whatcom. We would like clarification on what species and what percent will be managed for under the different alternatives and how hardwood composition on adjacent ownerships will this affect the watershed as a whole under the different alternatives. C14

4.. *Mapping of Unstable and Potentially Unstable Slopes (page 95).* We recommend inclusion of a short discussion of the mapping methods (aerial photography, ground survey) used to identify the unstable and potentially unstable slopes. The type of method(s) used could potentially influence the accuracy of areas that are available for timber harvest. C15

L58

5. *Adverse effects of timber harvest on unstable slopes (page 96).* It is unclear whether the statement "To date, timber harvest has had no adverse effects on areas mapped as potentially unstable slopes" applies to historic timber harvesting in the watershed. We request that more information be provided on how this analysis was conducted. C16

6. *Mercury and fires (page 97).* We would like to a discussion of literature, if any exists, relating to the release of mercury during wildfires. Mercury has been found in relatively high concentrations in smallmouth bass and yellow perch in Lake Whatcom, but the source has not been identified. C17

7. *Mercury and logging (page 99).* WDFW sent a letter to the Washington Department of Ecology (DOE) citing literature documenting a possible correlation between logging and mercury in two recent scientific studies conducted in Canada. This letter was sent in response to a DOE letter to DNR stating that there were not any likely water quality problems associated with the existing forestry regulations on state lands in the Lake Whatcom watershed. As already mentioned above, mercury has been found in Lake Whatcom fish and crustaceans. To date, WDFW has not received a reply or conflicting evidence to refute those studies. A copy of this letter was sent to DNR, but has not been referenced in the PDEIS or included in the Appendix. We request that this letter be included in an appendix to the DEIS. If you need another copy of this letter to include in the DEIS, we would be glad to provide it. C18

8. *Peak flows (page 102).* We would like to see a discussion of what proportion of roads to watershed land base is necessary to cause significant changes in peak flows. We would also like related information included in the DEIS that discusses the proportion of roads to land base on trust lands in Lake Whatcom and clarification of data and/or studies were used to support the statement regarding peak flows on p.102. C19

9. *Road density (page 103).* Please provide infomraiton in the DEIS on the road density on state lands in the watershed. C20

10. *Down wood (page 108).* Down wood can also function as nurse logs for other tree and plant species. C21

11. *Forest health (page 109).* Please provide more information on the principles by which DNR develops its forest health management guidelines e.g., are forest health practices tailored to economics, environmental health, or both? C22

12. *Wildlife and wildlife habitat (page 112).* Limiting analysis of wildlife and wildlife habitat to DNR-managed lands only in the Lake Whatcom watershed does not adequately address actual impacts across the landscape. This document states that some species benefit from the mosaic of open areas and young forest habitats that result from conventional timber harvesting, and species diversity increases. However, this type of landscape is much more common now than it was historically, and the species that use these habitats have greatly increased in number. Conversely, old forest habitats have been greatly reduced, and much of what remains is badly fragmented. The species that C23

L58

rely on these habitats are thus much more likely to be threatened or endangered. These are the species in need of pro-active management to protect their remaining habitats and foster the regeneration of more suitable habitat. Creation of more open area/young forest habitat, particularly at the expense of mature and old forests, will likely decrease wildlife diversity over the wider landscape, as well as harm the future viability of threatened and endangered species. We recommend that the analysis in the DEIS include discussion of this larger landscape context.

13. *Common Loon (page 113).* The common loon should be listed as a State Candidate (SC) species. C24

14. *Fish populations (page 118-22).* The PDEIS does not include an accurate discussion of the population status of the naturally-spawning native kokanee and cutthroat trout populations. Both species have experienced dramatic declines in numbers of naturally spawning fish in all lake tributaries since the mid-1970's. WDFW fisheries data documenting these declines were submitted to DNR, but were not included in the document. We request that this information be incorporated and its implications taken into account in the Draft EIS. C25

15. *Fish stocking (page 118-22).* There is no discussion or summary of the cutthroat trout stocking program that was initiated by WDFW in the late 1990's to supplement the documented population decline in the lake. Current fishing regulations do not allow harvest of cutthroat trout due to low population numbers. Large numbers of kokanee salmon have also been supplemented through the hatchery located at the south end of Lake Whatcom since the early 1900's. WDFW cutthroat stocking data was submitted to DNR (see attached) and kokanee stocking data can be found in Looff (1994). The EIS should include a discussion of the projected impacts on these native stocks if populations continue to decline from habitat degradation and if stocking programs are discontinued. C26

16. *Value of fish stocks (page 118-122).* The PDEIS does not include a discussion of the importance and value of the Lake Whatcom kokanee and cutthroat trout stocks to fisheries programs locally, statewide, nationally and internationally. Both salmonid stocks have developed in reproductive isolation for an extended period of time, and are genetically unique in the case of kokanee. The cutthroat trout stock may also be genetically unique. Both stocks are currently used in planting programs around the state. Kokanee eggs have historically been shipped to other states and countries at various times (Looff 1994). Periodic reintroduction of native fish eggs into the stocking program is needed to counter the effects of genetic degradation from propagation in a hatchery environment. C27

17. *Sudden Valley Provisional Urban Growth Area (page 138).* Whatcom County has designated Sudden Valley as a Provisional Urban Growth Area (PUGA). The PUGA is currently under appeal in Snohomish County by a local environmental organization. C28

L58

18. *Storm Water (page 151).* We request that a discussion be included in the DEIS that addresses cumulative effects of storm water from forestry practices and activities on other downstream ownerships. C29

19. *Water quality (page 157).* We would like documentation in the DEIS of scientific evidence that was used to determine that there would be no significant adverse impacts to water quality in the Lake Whatcom watershed through existing regulations for Alternative 1. We would like to an analysis of the expected nutrient loss per unit area for cutting type 5 buffers. WDFW has documented sedimentation concerns and the resulting negative impacts to rapidly declining native kokanee and cutthroat trout populations to DOE. We can provide you with this information for use in the DEIS. C30 C31 C32

20. *Water quantity (page 158).* We would like documentation in the DEIS of scientific evidence that was used to determine that there would be no significant adverse impacts to water quantity in the Lake Whatcom watershed through existing regulations for Alternative 1. Rain on snow events can also occur on elevations lower than 1,700 feet, even though they are not technically in the rain on snow zone. Combined with the highly erodable soils and underlying rock, steep topography, and higher precipitation in the southern portion of the watershed (relative to the northern portion), we think a potential exists for significant adverse impacts to natural resources. C33

21. *Early seral stage stands (page 159).* We disagree with your characterization of the importance of early seral forests. Early seral forest caused by logging is not the same as early seral forest caused by natural disturbance (Franklin et al. 2000). Furthermore, early seral forest due to logging is not in shortage in the landscape, and species associated with early seral plantation forests are not endangered. It is true that pole and closed canopy managed stands provide the least diversity of any forest development stage. Impact to wildlife can be mitigated by employing variable density thinning techniques. These techniques put forest development on an alternative pathway that avoids the biodiversity bottleneck associated with managed stands in the 40-70 year age class (Carey et al. 1996). C34

22. *Mineral Rights (page 173).* We would to see information in the DEIS regarding percentage of DNR land in the Lake Whatcom watershed has surface vs. mineral estate rights, including a map to show this information. C35

23. *Toxics and hazardous materials (page 182).* We do not agree that there are no significant adverse impacts for the release of toxics and hazardous materials. We believe that there is the potential for mercury to be released through logging practices and would like this topic discussed in the DEIS. C36

24. *Orphaned Roads (page 192).* The PDEIS should also state that orphaned roads are not legally required to be repaired under current forest practices rules. C37

25. *Fire (page 195).* Fire could also negatively impact cultural resources. C38

L58

26. *Type 5 stream buffers (page 199).* The size of the type 5 stream buffers should be C 39 mentioned in the text.

Thank you again for the opportunity to comment. If you have any questions regarding these comments, please do not hesitate to contact the Region Habitat Program Manager, Deborah Cornett, at 425-775-1311 x114.

Sincerely,

Greg Hueckel, Assistant Director
Habitat Program

GH:PS:kam

cc: Jeff P. Koenings, Director WDFW
Bob Everitt, WDFW Region 4
Deborah Cornett, WDFW Region 4
Alan Loof, WDFW Region 4
Mark Goldsmith, WDFW Region 4
Dave Whipple, WDFW Olympia
Paula Swedeen, WDFW Olympia

Literature Cited:

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AMERICAN FOREST RESOURCE COUNCIL

AMERICAN FOR RESOURCE COU

Malcolm R. Dick, Jr.
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October 28, 2002

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STATE LANDS DIV

Barbara MacGregor
DNR SEPA Center
1111 Washington Street SE
P.O. Box 47015
Olympia, WA 98504-7015

RE: SEPA Comments On Lake Whatcom Landscape Plan PDEIS by AFRC

Dear Ms. MacGregor:

Thank you for the opportunity to comment on the Lake Whatcom PDEIS.

The American Forest Resource Council (AFRC) is an association of the forest industry that represents numerous Department of Natural Resources (DNR) Timber Purchasers in Washington, Oregon, California, and Idaho. The DNR Timber Purchasers Committee is a standing committee of AFRC; the committee and its staff provide the principal interaction among DNR timber purchasers, DNR and the Board of Natural Resources (Board).

AFRC members have a vital interest in the on-going and future management of DNR managed trust lands in the Lake Whatcom watershed. All softwood lumber mills identified in the Commercial Timber Assessment (PDEIS, Appendix Section O) currently are members of AFRC. AFRC appreciates this opportunity to provided substantive comments on the Lake Whatcom DNR Landscape Plan Preliminary Draft Environmental Impact Statement (PDEIS) under the State Environmental Policy Act (SEPA). Our specific comments follow:

Active Forest Management Is The Answer, Not The Problem in Lake Whatcom. An EIS Alternative That Maximizes Trust Revenues While Maintaining Current Resource Protections Should Be Added

Legislation affecting Lake Whatcom, and PDEIS, is rooted in activist opposition to a single proposed trust land timber sale and concern over a poorly designed forest road. A subsequent Board tour clarified that the halted sale required the timber sale purchaser to reconstruct the road to current forest practices standards. Nonetheless, activists pressured local elected officials, and the previous Commissioner of Public Lands to pass legislation that resulted in the current PDEIS. Water quality and public safety appear to be surrogates for opposition to land management activities on DNR managed trust lands.

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Water quality concerns that served as the basis for legislation empowering the Lake Whatcom DNR Landscape Planning Committee (Committee) were legitimate but misdirected. The Department of Ecology is on record as saying, *"(p)roperly managed commercial forestland has been recognized as the most benign active land use for watershed protection for some time."* The Department of Heath said, *"(i)t is our understanding that very few of the potential contaminant sources identified in the Source Water Protection Plan for Lake Whatcom could originate from State Forest Lands or DNR activities"* (PDEIS Appendices).

Whatcom Lake has serious water quality issues that should be addressed by Whatcom County and agencies that deal with coliform, nutrient loading and other contaminants. Properly conducted active forest management is consistent with watershed protection and can help mitigate problems uncovered during DNR's landscape management planning.

The PDEIS should include one or more Alternatives, which optimize trust revenues and economic benefits while providing reasonable watershed protection by DNR. To the extent feasible, the PDEIS should highlight water quality problems discovered during the forest management investigations.

An EIS Alternative Is Needed That Evaluates Partial or Total Divestiture (or Repositioning) of Trust Lands to Assets Outside the Lake Whatcom Watershed

AFRC supports maintenance of DNR's managed forest landbase. The PDEIS should address sale or trade of some or all lands in the basin. The consideration for the sale or exchange of trust lands is imbedded in each PDEIS Alternative under Objective 18: Consider Other Revenue Generating Mechanisms. This imbedded consideration is not developed as part of the PDEIS and, as such, is inconsistent with SEPA. **The EIS should include a least one Alternative that specifically describes and analyzes asset divestiture.**

As a matter of record, AFRC firmly believes most Lake Whatcom trust lands can be managed to optimize timber revenue and water quality. Two state agencies, whose business is water quality, believe forest management is the best means of protecting water quality. DNR, however, needs to substantively review divestiture as a part of the SEPA process.

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Current PDEIS Alternatives Fail to Balance Social, Economic and Environmental Values; a Stated Goal of the Board of Natural Resources

The Board repeatedly has opined that they, and the public, seek to balance social, economic and environmental values (see PDEIS appendices). Alternatives #3-5 clearly fall outside these parameters. DNR lands inside the watershed have the biological capacity to generate $3.3 million annually for trust beneficiaries, and can generate $1.6 million annually under the Habitat Conservation Plan (HCP). Alternatives #2-5 would produce trust revenues significantly below these amounts (see below discussion). In addition, active forest management is seen as the best means of protecting Lake Whatcom's water quality. **As the Board ultimately will approve a Lake Whatcom Landscape Plan, any EIS Alternative must be consistent with the Board's stated goals and objectives. The alternatives should be rewritten to achieve such consistency.**

Alternatives #2-5 Substantially Reduce Net Present Values Without Offsetting Benefits in Water Quality, Public Safety, or Other Non-Timber Incomes

Using a 6% real discount rate, the PDEIS Financial Assessment (Appendix Section PDEIS-4) reveals substantial reductions in Net Present Value (NPV) for Alternatives #2-5 of: -$9.7 million, -$23.3 million, -$23.7 million, and -$27.3 million, respectively, when compared with forest management under Alt. 1. These reductions are for *timber revenues only* and do not include other direct and indirect local and statewide economic benefits that accrue to commercial forest operations and milling. Thus, the economic magnitude of projected NPV reductions substantially is understated. The document should reflect this fact.

The PDEIS Financial Assessment of benefits from other income opportunities deserves more discussion in the EIS, using this the following statement as a base:, *"(i)t appears highly unlikely that combined revenues from carbon sequestration, certified lumber production, and leasing of trust land for recreation activities could financially justify the choice of either of the landscape alternatives...over the reference alternative (Alternative 1)"* This essentially is the same conclusion from the recent Blanchard Mountain assessment. Discussed later is our concern that Alt. 1 accurately does not reflect "no change" conditions and should be rewritten.

The 1992 Plan, 1997 HCP, 1997 Lake Whatcom Watershed Analysis, 1997 Draft Lake Whatcom Landscape Plan, and 1998 Forest & Fish Rules, guide current DNR management inside the Lake Whatcom Watershed. The Departments of Health and Ecology both said (see above comments) that current DNR policies in Lake Whatcom adequately protect public resources. Thus, under the *Prudent Person Doctrine* of the *Trust Mandate* (1992 Forest Resource Plan), it must be asked what additional benefits accrue to either the trusts or public from even analyzing (or contemplating) alternatives that fail a reasonable cost vs. benefit analysis, and that are clearly adverse to the economic interests of the trust beneficiaries?

PDEIS Alternatives #3-5 are "unreasonable in their range" under SEPA and violate the prudent person doctrine. New alternatives must be developed to comply with the trust mandate, the prudent person doctrine, SEPA and legislative instructions.

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The Blanchard Mountain Timber/Recreation Assessment Should Be Incorporated in the EIS

A new resource and recreation value study on Blanchard Mountain DNR lands confirms that timber production produces the highest economic value for state trust lands and trust beneficiaries. This information strongly suggests that multiple resource values *simultaneously* can be accommodated on Whatcom County lands adjacent to Lake Whatcom. The findings from this new assessment should be incorporated in the Draft Environmental Impact Statement (DEIS).

The PDEIS Fails to Link With DNR's On-Going Sustained Yield Process as Required by ESSSB #6731

Legislation that created the Lake Whatcom Landscape Planning Committee (ESSSB 6731) also requires in Section 1-(4) that revised management standards for Lake Whatcom should be consistent with the sustained yield established by the Board of Natural Resources. This fact is not prominent in or discussed by the PDEIS. The PDEIS alternatives do not match the seven different alternatives presently being considered by the Board of Natural Resources for all other state lands in western Washington.

EIS alternatives should be consistent with SHC alternatives including creation and evaluation of options that will achieve economic and water quality objectives.

PDEIS Management Objectives "Adopted" By The Department and Committee Should Be Reviewed For Consistency With the 1992 *Forest Resource Plan and Trust Mandate*

Twenty-one management objectives are identified in the PDEIS (pages 25-26). These objectives need to be reviewed in the context of the overall 1992 Forest Resource Plan (1992 Plan), in particular the Trust Mandate. For example, there is no explicit management objective in the PDEIS that provides for maintaining or increasing revenues from timber production to provide sustainable income to trust beneficiaries. This is a glaring omission in PDEIS objectives.

Forest Plan Policy #16 (Landscape Planning) provides for the establishment of overall landscape management objectives; this policy explicitly states that participation from outside professionals in the fields of road engineering, forestry, and economics should be encouraged. These disciplines were conspicuously absent from the Committee (See below discussion), and this omission is reflected in the deficiencies present in the limited range of alternatives presented in the PDEIS.

The discussion of PDEIS alternative and management objective primacy on page 27 is completely devoid of any discussion (or apparent acknowledgement) of the Trust Mandate. The 1992 Plan provides clear guidance on this point. Page B-1 of the 1992 Plan states, "*The question of balancing greater environmental protection and trust income should be approached from four perspectives: 1) the prudent person doctrine; 2) undivided loyalty to the trust beneficiaries; 3) intergeneration equity, and 4) the problem of foreclosing future options.*" **The EIS needs a thorough discussion of how each EIS Alternative helps DNR and the Board fulfill the Trust Mandate.**

Private Foresters and Knowledgeable Stakeholders Were Excluded From the PDEIS

A well-intended process, albeit sanctioned on a mistaken premise, was co-opted by special interests when knowledgeable forest industry professionals and adjacent landowners were excluded from Committee participation. We doubt the legislature had this in mind when they passed ESSSB 6731. This action likely violates the bill's intent; further, it violates the Trust Mandate and Forest Resource Policy 17.

FRP Policy 17 states, "*The Department will solicit comments from interested parties, including local neighborhoods, tribes and governmental agencies when preparing landscape-level plans.*

Discussion

As part of the landscape-level planning effort, the department will consider information from public entities, adjacent landowners and other interested parties.

The department will attempt to integrate the plans of others so that state forest lands are managed in a comprehensive manner and environmental impacts are minimized.

The department will present its planned timber harvest schedules to the public at biannual reviews."

Purchasers and landowners actively sought to take part in the Committee process and were rebuffed. We were not ignored...we were excluded from the process, which probably is illegal but certainly is inappropriate. Many of the obvious problems with the committee proposals and alternatives could have been avoided had all stakeholders been able to participate. We hope in view of that action, these comments will be taken as input that was missing in original discussions of the Lake Whatcom planning process, and that appropriate revisions will be made that reflect our belated input.

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DNR Has a Legal Obligation To Seek Compensation For Altered Land Management; This Was Not Identified in the PDEIS

The law requires compensating DNR for additional watershed protections. RCW 79.01.128 states, *"In the management of public lands lying within the limits of any watershed over and through which is derived the water supply of any city or town, the department may alter its land management practices to provide water with qualities exceeding standards established for intrastate and interstate waters by the department of ecology: PROVIDED, That if such alterations of management by the department reduce revenues from, increase costs of management of, or reduce the market value of public lands the city or town requesting such alterations shall fully compensate the department*(emphasis added)." This statute should be recited and discussed in the PDEIS.

The PDEIS Alternatives Include Trust Lands Outside The Watershed

Map A-2 in the PDEIS Appendices identifies approximately 1,200 acres of state lands (7.5% of total) that are outside the hydrographic boundary of Lake Whatcom that nonetheless have been included in the PDEIS Alternatives. Applying the restrictions embodied in ESSSB #6731 to lands outside the hydrographic boundary cannot possibly have any material physical impact on water quality inside the watershed.

The EIS should exclude additional restrictions described in ESSSB #6731 from applying to trust lands outside the Lake Whatcom hydrographic boundary.

Information From Oregon State University on Water Supplies From Forest Watersheds Should Be Incorporated in the EIS

Attached to these comments is a publication entitled *Municipal Water Supplies from Forest Watersheds in Oregon: Fact Book and Catalog* prepared by Adams & Taratoot at OSU. This publication provides a concise understanding of the complex relationships between water supplies and forest management. A principal finding of the OSU study is the demonstrated need to protect water supplies from forested watersheds from the disastrous effects from wildfire.

Lake Whatcom watershed has a history of stand replacement fires. A discussion of wildfire risk and mitigation completely is absent from the PDEIS Fire Management Assessment (Appendix Section M). Although The Oregon review focuses on 30 major municipal water systems in Oregon, the information is transferable to Lake Whatcom. Key findings from this report should be incorporated into the PDEIS Water Quality Assessment (Appendix Section E).

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The PDEIS Slope Stability Map Lacks Accuracy and Fails To Separately Map "Unstable Slopes" and "Potentially Unstable Slopes

The PDEIS Slope Stability Assessment (Appendix Section G) describes a process by which a Sensitive Area Slope Stability Map was prepared (map G-2). The issue of unstable slopes vs. potentially unstable slopes is a key issue as a result of a literal interpretation of ESSSB #6731, which states, *"harvest and road construction upon **potentially** unstable slopes shall be carefully regulated."* This legislation further states that road construction or reconstruction is prohibited on unstable slopes. However, the Slope Stability Assessment states *"...the specific location of stable, potentially unstable, and unstable slopes are probably not represented entirely accurately on the map."* Furthermore, the locations of unstable slopes and potentially unstable slopes have not been mapped separately. The Assessment instead defers to definitions and field identification procedures as operational alternatives.

There is an enormous difference between unstable slopes and potentially unstable slopes. For the purpose of developing landscape alternatives and their analysis, a map is required that distinguishes between the two. They were not mapped separately and existing maps are admittedly inaccurate, both of which call into question the very basis upon which the PDEIS Alternatives were developed and analyzed. As such, the mass wasting analyses, particularly in Alternatives #2-5, are fundamentally flawed and need to be rewritten.

PDEIS Alternative #1 (No Action Alternative) Is Inaccurately Described And is Not the True No-Action Alternative

The PDEIS No-Action Alternative purportedly analyzes DNR's existing policies, procedures, legal requirements and management commitments, and supposedly is consistent with the Tier 3 alternative identified in the sustainable harvest calculation (SHC). Alternative 1, however, appears to have been developed consistent with the 21 PDEIS management objectives (*"with the advice of the Committee"*) presumably absent review and approval by the Commissioner of Public Lands (Commissioner) and the Board (PDEIS pp. 28-34). Furthermore, the DNR Westside Tier 3 SHC Alternative does not contain these same management objectives.

The EIS No-Action Alternative accurately must portray DNR's *existing* policies, procedures, and legal requirements absent landscape-specific management objectives. PDEIS Alternative #1 should become Alternative #2 in the EIS, which incorporates appropriately reviewed (and approved) landscape management objectives. A new #1 should be developed that truly reflects current (no action) conditions.

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33-150 foot No-Cut Riparian Management Zones on Type 5 Streams Are Arbitrary, Capricious, and Exceed The Requirements of ESSSB #6731.

PDEIS Alternatives #2 (33-foot), and Alternatives #3-5 (150-foot), include no-cut Riparian Management Zones (RMZ's) on Type 5 streams. ESSSB #6731 simply describes that RMZ's will be established "along all streams", does not specify their widths, and certainly does not preclude active management within Type 5 RMZ's, particularly to achieve other habitat objectives. PDEIS Alternatives #2-5 do not reflect this flexibility as provided by the legislation and, thus, do not reflect a reasonable range of imbedded Type 5 RMZ alternatives as required by SEPA. Forest Practices rules, DNR's HCP, the 1992 FRP all address riparian zones and should provide guidance on riparian zones.

AFRC sincerely appreciates this opportunity to comment on the PDEIS. We look forward to working with the Department as the Lake Whatcom Landscape Planning process moves forward.

Please contact us if you have questions or require additional information.

Thank you.

Sincerely,

M. R. Dick

Malcolm R. Dick, Jr.
Washington Manager

Attachment

C/ Board of Natural Resources
Tom Partin, President, AFRC
DNR Timber Purchasers

L60

COPY

NORTHWEST ecosystem ALLIANCE
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Facsimile Transmittal Cover Sheet

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Comments Regarding Lake Whatcom PDEIS

L60

From: MARIAN BEDELL
3660 Seeley St
Bellingham, WA 98226-4368

October 15, 2002

To: William Wallace, DNR Northwest Regional Manager
SEPA Center, Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Comments Regarding Lake Whatcom PDEIS

- No chemical pesticides used.
Native American Cultural sites unaffected unless the tribe(s) is in full agreement.
- No new roads in unstable soils/conditions, and reconfiguration of any existing roads in those conditions to bring risk of blowout to near-zero.

- The financial net return differences between Alts 2, 3 & 4 are almost negligible, in proportion to whole budget levels of all agencies involved, including the school systems.

- I am most comfortable with Alt 4 or minor variations of it.

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From:

October 15, 2002

To: William Wallace, DNR Northwest Regional Manager
SEPA Center, Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Comments Regarding Lake Whatcom PDEIS.

STREAM BUFFERS ON ALL STREAMS SHOULD BE THE MAXIMUM ALLOWED FOR ANY OF THE ALTERNATIVES.

WIND BUFFERS SHOULD BE THE MAXIMUM ALLOWED FOR ANY OF THE ALTERNATIVES AND SHOULD PROTECT BOTH SIDES OF THE STREAM.

NO ROAD BUILDING SHOULD BE ALLOWED ON POSSIBLE OR PROBABLE UNSTABLE SLOPES.

HIGHEST PROTECTIVE BUFFERS ALLOWED IN ANY OF THE ALTERNATIVES SHOULD BE GIVEN WETLANDS OF ANY SIZE. THIS BUFFER IS TREES & MORE TREES FOR WIND BUFFERS.

ON AREAS WHERE CUTTING IS ALLOWED, RETAINING 70% OF THE TREES ANY LOGGING ON A 200 YR ROTATION IS PREFERRED.

NO ROAD CONSTRUCTION ON

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CHEMICAL APPLICATION WILL ENSURE HIGH QUALITY OF DRINKING WATER IN THE LAKE WHATCOM WATER SHED.

85,000 PEOPLE (2002) RELY ON LAKE WHATCOM FOR THEIR DRINKING WATER. I FAVOR THE STRONGEST PROTECTION OF OUR DRINKING WATER + PUBLIC SAFETY.

~~I~~ I URGE YOU TO SELECT ALTERNATIVE 4.

HENRY M. LAGERGREN
324 SUDDEN VALLEY
BELLINGHAM, WA
98229

L60

From:
Jo Kaus
4176 Malachite Rd
Bham. Wa 98226

October 15, 2002

To: William Wallace, DNR Northwest Regional Manager
SEPA Center, Washington State Department of Natural Resources
1111 Washington Street SE
MS:47015
Olympia, WA 98504-7015

Comments Regarding Lake Whatcom PDEIS

Thank you for considering my comment on the Lake Whatcom PDEIS.

I drink water drawn from the Lake Whatcom watershed. So do my children, my friends and my neighbors. For me this isn't an obtuse issue to be argued with facts and figures. Its personal.

We, the citizenry, have before us an opportunity to take a first step toward protecting the quality of the water we drink. I believe alternative 4 is that first step.

The more we protect and preserve our watershed, our water source, the healthier our future will be. Alternative 4 provides maximum protection for streams & riparian zones with a minimum impact from road construction and chemical application.

First steps can be challenging, precarious – even frightening, but none of us would get very far without them. Please move forward into a future of sound forest practices that secures our community's drinking water

Sincerely

Jo Kaus

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To Sepa Center	From B L. Pplg
Co.	Co. U of W
Dept. DNR	Phone # 206 543 8684
Fax # 360 902 1776	Fax # 206 685 0790

Barbara MacGregor
DNR SEPA Center
1111 Washington Street SE
PO Box 47015
Olympia, WA 98504-7015

October 28, 2002

RE: Lake Whatcom Landscape Plan

Dear Ms. MacGregor

Perspective: I am a Professor in the College of Forest Resources at the University of Washington, Director of the UW/WSU Rural Technology Initiative and President of the Consortium for Research on Renewable Industrial Materials (CORRIM), a consortium of 13 research institutions in the US and Canada devoted to the development of life cycle environmental performance measures for renewable materials used in construction. My area of research for the last decade has been focused heavily on the economic impacts of managing forests for timber and non-timber values. I have participated in several studies that have developed more cost effective management pathways for restoring habitat and riparian functions for species dependent upon old forest structures. I also contributed to a thorough analysis of the limitations of the DNRHCP. I would like to comment on several aspects of the Lake Whatcom Landscape Plans relative to the experience that I have gained through these prior efforts.

Active Management Alternatives are Conspicuously Missing from the Lake Whatcom Alternatives

Looking at the Lake Whatcom plans brought back memories of our extensive effort in reviewing the DNR HCP just a few years ago. The Lake Whatcom HCP scenario results in a 52% decline in harvest much like the decline we simulated for the DNRHCP in 1996. Our analysis (Bare et al 1997, Bare et al 2002) suggested that by practicing landscape management (active management pathways to restore some habitat conditions) rather than landscape preservation, the economic (and harvest) losses could be reduced substantially while producing at least as much habitat measured by habitat suitability indicators (and riparian functions) across the managed lands. The other Lake Whatcom planning alternatives show even greater harvest and revenue losses than the HCP scenario. The methodology for managing lands for environmental values while also producing revenue for trust beneficiaries has been well documented by our study using principals developed in the Washington Forest Landscape Management Project (Carey et al, 1996, Carey et al 1999).

I have attached a summary fact sheet on our early analysis of the DNR HCP that provides the results of a series of sensitivity runs to better understand the difference between management alternatives and largely land preservation approaches. We found management pathways that could achieve higher habitat suitability indicators than the DNR HCP plan with an economic loss of only 20%, incorporating active management for habitat protection and restoration objectives.

The Lake Whatcom *Plans Are Not Consistent* with the DNR Sustainable *Harvest Calculation* Alternatives

Even DNR's current effort to determine the sustainable harvest level for DNR lands is attempting to evaluate alternatives much like those developed in these studies. Alternatives like these are conspicuously missing in the Lake Whatcom planning alternatives. The alternative plans erroneously assume that no-management provides the best pathway for habitat conservation. These studies have shown that active management alternatives can produce habitat restoration and better protection at lower cost and thus with better revenue for trust beneficiaries. The plans being considered are not in the best interest of the trust beneficiaries because they do not include a search for better economic alternatives. They are also seriously lacking in metrics that can provide useful measures of environmental protection.

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It would be far better to wait for the results of the current DNR sustainable harvest level strategic analysis process to determine best strategies than lock in any of the current Lake Whatcom Alternatives. If the current DNR sustainable harvest calculation planning efforts come close to replicating our methods we can expect similar results which can also be applied to the Lake Whatcom Landscape.

Carbon Sequestration is Increased by Forest Management and the Use of Wood Products

Testimony presented at the hearing inferred that not managing forestland provided the greatest contribution to carbon sequestration, and therefore mitigation to prevent global warming. That testimony was incorrect on several points resulting in an erroneous conclusion. Over the long term, the carbon stored in unmanaged forests is in approximate equilibrium, neither increasing nor decreasing and makes no contribution to global warming. The carbon stored in long lived products such as the lumber in housing continues to increase providing a growing pool of stored carbon hence some contribution to reducing the causes of global warming (Bowyer et al 2002, Bowyer 2001). However, not harvesting or even delaying the harvest of wood for products contributes to the substitution of steel and concrete which is fossil fuel intense, increasing carbon emissions and the contribution to global warming. I have attached a short fact sheet and appropriate references that should help to correct the record on this point.

The Impact of Runoff from Harvest Units Depends Upon Many Factors

Testimony presented at the hearing also inferred that runoff from harvest units (clearcuts) dramatically increased runoff during the event, thus increasing erosion, and reducing water quality. While I do not pretend to be an expert in this area I know it is a complex question and asked a PhD Candidate that has been doing research in this area to respond. I have attached his comments. As you will note, the issue is complex with many more considerations important than were implied by the prior testimony.

While it is quite appropriate that DNR should be using the best science for managing the forest with sustainability objectives in mind, that frequently requires understanding the issues in considerable depth. We are more than happy to provide the results of relevant research and consultation on the development of alternative plans if that would be of assistance.

Bruce Lippke
Director, Rural Technology Initiative
College of Forest Resources
University of Washington
& President, CORRIM

Attachments:
(1) DNRHCP Impact Fact Sheet
(2) Carbon Fact Sheet
(3) Rain runoff question and response

References:

Bare, B. Bruce, B. R. Lippke, W. Xu. 2002. "Cost Impacts of Management Alternatives to Achieve Habitat Conservation Goals on State Forest Lands in Western Washington." Western Journal of Applied Forestry, 15(4) 2002. Pp217-224.

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Summary of Analysis

Demonstration of Trust Impacts from Management Alternatives to Achieve Habitat Objectives on DNR Managed Lands

A 1995 review of the Washington State Department of Natural Resource (DNR) proposed Habitat Conservation Plan (HCP) noted that no search for lower cost alternative treatments was provided and that no meaningful baseline assessment existed against which the proposed HCP option could be compared. Hence, the Department's claim that the proposed HCP was in the best economic interests of the trust beneficiaries was not valid. The reviewers proposed an approach that would be sufficient to determine if adequate habitat could be provided while contributing greater benefits to the trust beneficiaries. Since the Department did not respond to the identified inadequacies, the University of Washington and Washington State University commissioned a demonstration of the recommended procedures on the Westside acres managed by DNR (1.4 million acres).

Results summarized below demonstrate that management alternatives exist to meet habitat conservation goals at substantially lower cost than the strategy adopted in the DNR HCP -- producing as much as 80% more value and $300 million more revenue per year to trust beneficiaries. DNR's HCP contributes unnecessarily to reduced financial trust performance with indications that some trusts may be harmed, or at least are not equitably benefiting from the gains that should be possible from collective management.

Simulating management alternatives and the DNR HCP: The difference in Net Present Value (NPV) between a simulated DNR HCP and the actual DNR HCP is shown to be insignificant. However, the NPV difference between management alternatives to achieve minimum habitat goals compared to the DNR HCP is substantial.

Impact of habitat goals and alternative management strategies	**NPV ($billion)**
* Forest Practice Board (FPB) riparian buffers and green tree retention	15.1
* Addition of 1996 FPB murrelet and owl (SEA) habitat (current minimums)	13.3
* DNR's HCP including nondeclining harvest flow constraints (equivalent prices)	7.4
* Alternative (ALTS) with more habitat and better intergenerational equity	13.3

(DNR HCP uses nondeclining flow constraints vs. +/-10% change per decade for the other alternatives)

DNR's adherence to nondeclining harvest flow constraints in conjunction with habitat conservation set-asides produces intergenerational differences more than twice as large as the ALTS alternative as well as reduced revenue from a $5.9 billion lower asset value. Sensitivity analysis identified seven major contributors to this inferior performance.

Sensitivity analysis of the individual factors that contribute to the ALTS alternative producing 80% higher NPV than the simulated DNR HCP

(1) undermanaged riparian management zones vs. partial harvest treatments	6.1%
(2) off-base unstable slopes vs. adaptive management of sensitive areas	7.8%
(3) owl/murrelet off base nests & zones vs. managed biodiversity pathways	9.6%
(4) DNR treatments with 60 year minimum rotations vs. a range of alternatives	10.8%
(5) nondeclining flow constraints vs. +/-10% decade to decade maximum change	8.8%
(6) small DNR planning units vs. a single management unit	10.3%
(7) excessive harvest losses* vs. losses adequate for debris and snags	8.0%

*DNR released sustainable harvest calculations in October 1996, after the HCP public review period, with unexplained harvest losses nearly twice as large as shown here -- another loss to trust beneficiaries.

Cumulative improvement for alternatives relative to DNR HCP ***80 %***

Each of the management differences identified above are contributing significant losses to trust beneficiaries.

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Explanation of differences: The DNR HCP losses are based on set-aside or minimal management approaches which may be sufficient to eventually produce habitat goals but are not the only alternative available and are economically less efficient in meeting conservation goals. The demonstrated alternatives produce almost four times as much late-seral forest structure (of importance to multi species habitat) per $ of cost (or loss) compared to the simulated DNR HCP. DNR relied on a science team composed of biologists heavily weighted to regulators and federal agencies to set end point conditions without consideration of silvicultural and economic alternatives. A multi-disciplinary team representing both biological/habitat expertise, silvicultural expertise and fiduciary trust management interests, such as utilized by the private sector for development of an HCP, would have searched for lower cost alternatives like those demonstrated.

Demonstrating that an HCP is better than managing to minimum standards: Habitat measures used in the analysis to assure that the simulations met minimum standards and that the alternatives produced at least as much habitat as the DNR HCP included: (a) Forest Practice Board definitions for Old, Sub-mature and Young Forest Marginal suitable owl habitat; Dispersal; and Murrelet habitat; and (b) the best available multi-species habitat measures from the Washington Forest Landscape Management project including six stand structure classes and three multi-species habitat indices. Acreages for each of these biological measurement classes were developed for each treatment alternative, a richness in biological measures not provided in the DNR HCP but necessary for comparative evaluation.

In order for the HCP to be in the best interests of trust beneficiaries, the HCP should provide the lowest possible loss to the beneficiaries that also meets current and expected future regulatory requirements. The simulated current 1996 minimum regulatory standards resulted in an NPV close to the ALTS-alternative but substantially higher than the simulated DNR HCP. As a consequence, to lower the risk that more restrictive regulatory actions in the future could further reduce the NPV, the strategies in the demonstrated alternative could be developed as a multi-species HCP.

The no-change baseline used by DNR for comparison to the HCP showed losses almost as high as their proposed HCP -- evidence that it was impacted by much more than minimum standards and was an invalid baseline for determining whether their HCP would be in the best interests of the trusts.

Fiduciary approaches for individual trusts: It is necessary to show that individual trusts are not harmed by collective management for the benefit of other trusts. This requires a trust-by-trust analysis of minimum standards applied to individual trusts to be used as a baseline to show that collective management procedures do not benefit some trusts at the expense of others. DNR did not provide such an analysis. For the most appropriate allocation of economic gains from collective management (gains that offset part of the losses from minimum standards) an equitable procedure is developed that allocates regained benefits to the individual trusts proportionate to what they lost.

Exceeding comparable conservation standards applied to the private sector: Forest practice regulations for green tree retention, adjacency greenup and class 1-3 stream buffers (as included for all simulations in the report) produce losses estimated at 9.5% from a no regulation base. The minimum owl and murrelet standards under the 1996 Forest Practices Board were estimated to increase losses for DNR acres by 13% for a 21% total loss relative to no regulations. The proposed DNR HCP results in a total loss in excess of 50%. The demonstrated alternative results in total regulatory costs of 20%. It also produces substantially more habitat than minimum standards, even more than the DNR HCP, and therefore probably reflects an unnecessarily high standard for habitat conservation. While no direct private sector HCP cost comparisons are available, some owners have found the requirements sufficiently costly to motivate their efforts to reduce the cost by developing an HCP. Anecdotal evidence suggests their habitat goals and resulting costs are substantially lower than the DNR HCP, and therefore ALTS, such that goals closer to minimum requirements might be sufficient and therefore be in the best interests of the trusts.

For more information see the report entitled, Demonstration of Trust Impacts from Management Alternatives to Achieve Habitat Objectives on DNR Managed Lands, College of Forest Resources, Box 352100, University of Washington, Seattle 98195-2100. Fax (206) 685-0790

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What is the role of forests and forest management on carbon storage?

Question: A gentleman discussed Carbon (C) storage and made it sound like an old growth forest was the only option to efficiently store Carbon. He went on to say those who suggested C could be stored in forest products were incorrect, that those products deteriorated over time and released the C. He presented his argument in the context that Old Growth lasted forever and stored C forever. He not once mentioned fires, insects and disease and the fact that trees don't live forever.

On the question of the forests role in storing carbon and the impact of forest management on carbon storage, a consortium of 14 research institutions across the US (mostly universities) have been looking at this question for several years. The Consortium for Research on Renewable Industrial Materials (CORRIM), a not for profit university lead government research group, developed a research plan in 1998 to study the complete environmental performance of wood by developing a life cycle inventory (LCI) data base of all inputs and outputs from forest regeneration, through harvest, processing, construction, building use and final disposal. They completed an interim report on forests in the PNW and SE in March of 2002.

Their reports and presentations at the 2002 annual meeting of the Forest Products Society (www.CORRIM.org) characterize the impact of forests and forest products on carbon under several management strategies.

The simplest example often cited is that you can store more carbon in the forest on longer rotations or with no harvest at all. It is true that extending the rotation age from 50 to 100 years in the PNW will more than double the inventory of wood and carbon stored in the forest. Extending the age even further will increase the carbon stored somewhat more but eventually, due to natural disturbances such as windstorms, fire, and disease the volume of timber and carbon stored will decrease, followed by new growth and renewal. Looked out over the long term across these disturbances and with no harvesting, there is no increase or decrease in carbon stored in the forest.

However, this is just the beginning of the carbon storage accounting if any products are removed from the forest. While short-lived products such as paper may enter the waste stream quickly and decompose, long lived products including housing construction continue to grow over time as more houses are built and the carbon stored in houses lasts longer than the rotation age, thereby accumulating carbon storage from rotation to rotation. The housing stock continues to increase and the carbon stored in housing is increasing. The carbon stored in trees, and short and long-lived products is shown in figure 1 for

a short rotation (40 years) and in figure 2 for a longer rotation (80) years. The carbon in short-lived products decomposes rapidly resulting in carbon emission while those in long-lived products decompose slowly with some residual build-up in storage from rotation to rotation. Figure 3 shows the carbon stored in the forest without harvesting assuming no natural disturbances.

Figure 1:

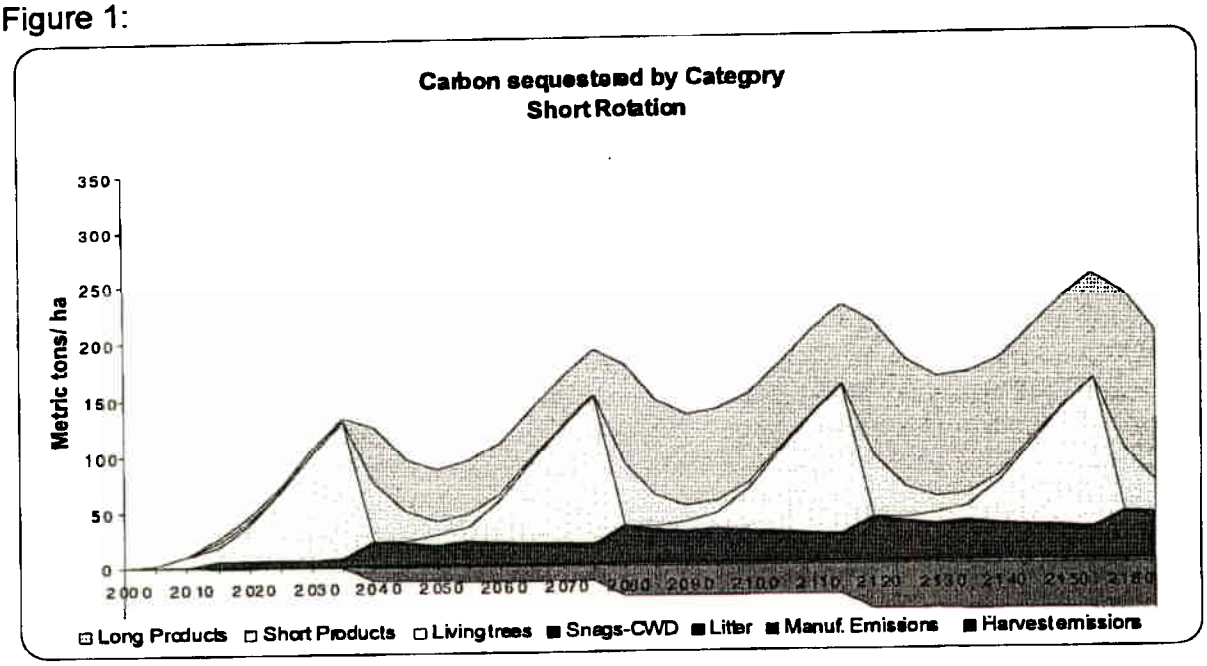


Figure 2:

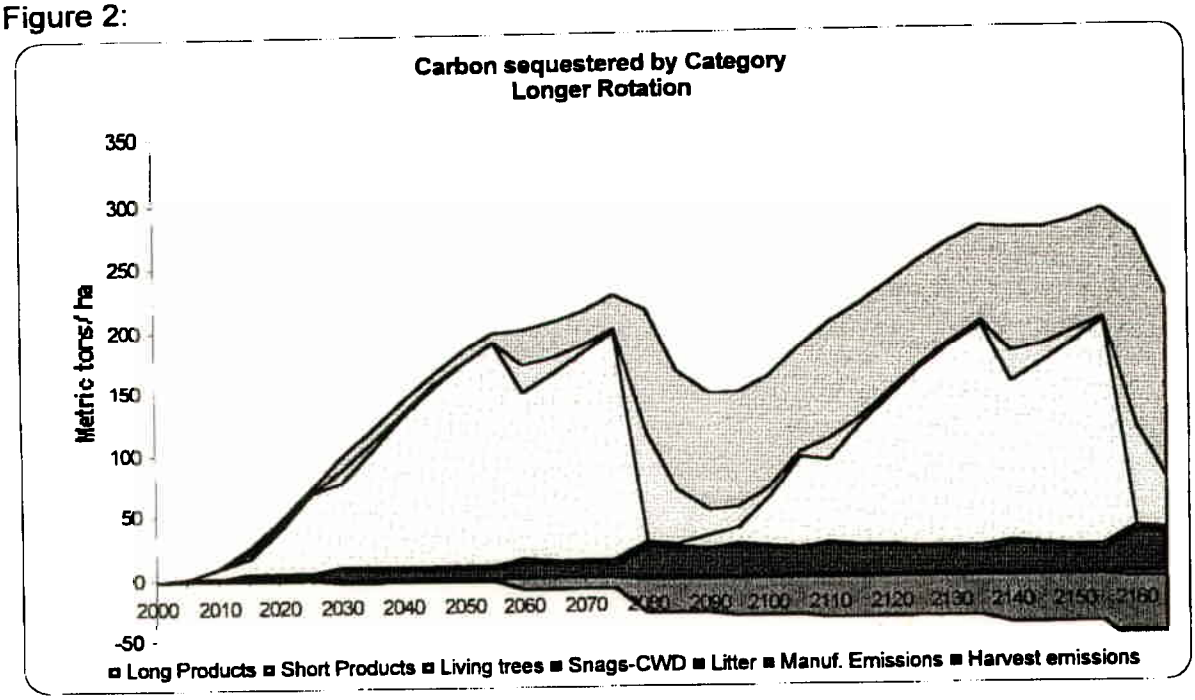
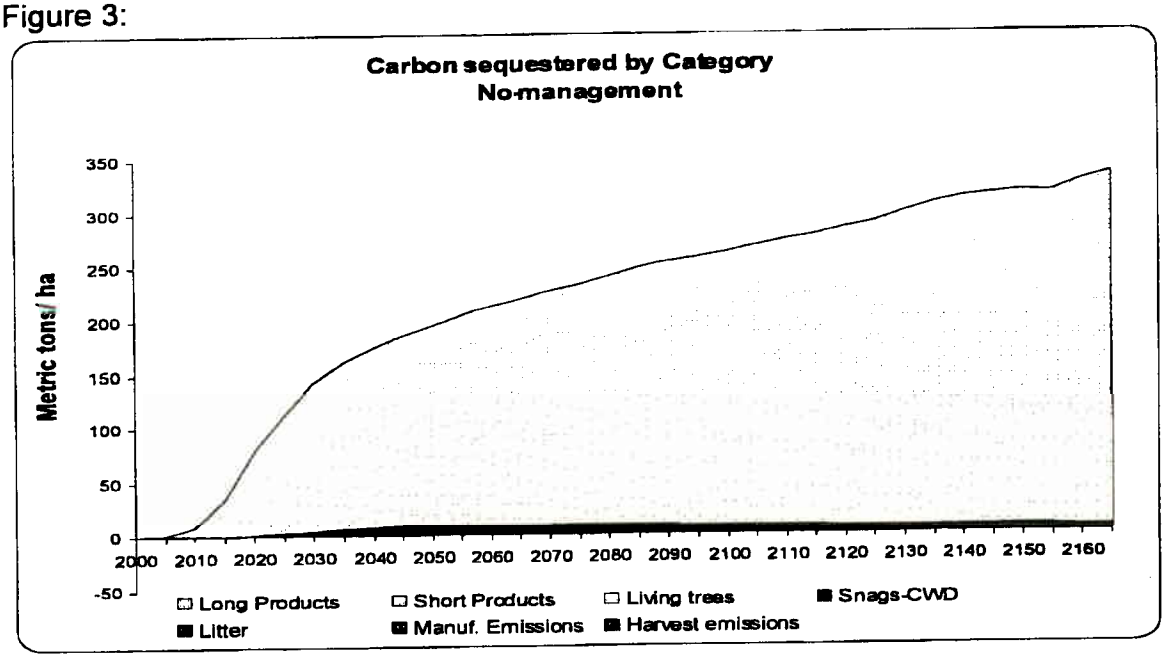


Figure 3:



If the short lived products are used as a biomass source for producing energy (co-generation), net electrical energy is added to the electrical grid, displacing

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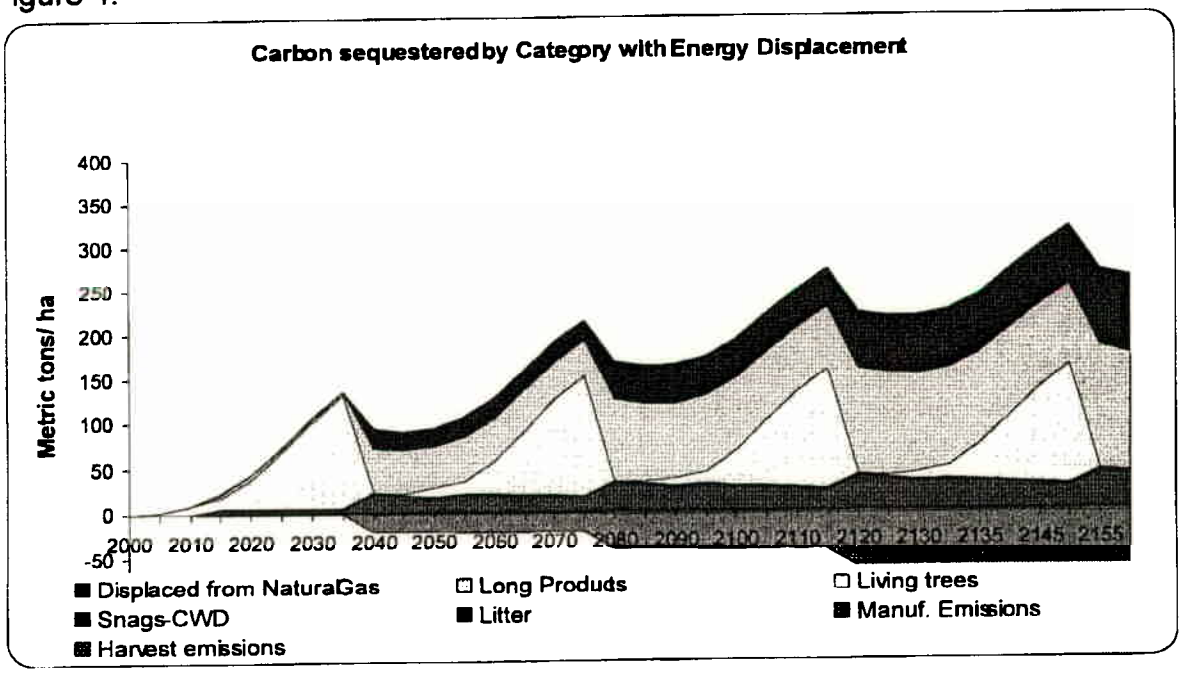
fossil fuels as another source of accumulating carbon storage (reduced emissions) from rotation to rotation. While a low valued use of wood and not the best way to increase carbon storage, using the wood as a fuel, thereby substituting for fossil fuels, will increase carbon storage over time. While some of the short lived products are always used for energy, some of these products will generally produce higher value than when used for energy production. Figure 4 shows the full energy burden to produce both short and long-lived products and the energy credit when the short-lived products are used to produce electrical energy instead of using natural gas, the most efficient fossil fuel source for energy.

Figure 4:



The impact of long rotations or no harvest produces a very counterproductive impact on the product stream. Forests taken out of production or delayed

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harvests result in the substitution of other products that are generally fossil fuel intensive like steel and concrete. This delay in producing products from wood as is evident by comparing Figure 1&2 necessitates the use of substitute products that substantially increase carbon emissions (reducing carbon storage).

Drawing the boundary conditions for the analysis around a forest is only correct if there is no harvest, in which case over the long term the forest stores a substantial amount of carbon but it is neither increasing or decreasing looking across disturbance cycles. In that sense, it plays no role in the equation of global warming and how to reduce carbon emissions.

While long rotations may store more carbon on the forest floor and contribute more products for carbon storage in the long term, the short-term deficit of wood that results from extending the rotation cannot be ignored. Substitution in steel and concrete during the interval between a short rotation of 50 years to a longer rotation produces such large carbon emissions from substitute products that long rotations are only useful for carbon storage if we talk in terms of hundreds of years, far beyond any policy targets under discussion.

Figures 5 and 6 show the impact of carbon stored under various management regimes first without accounting for product substitution and then with product substitution to produce the same number of houses in Minneapolis, substituting steel houses when there is a shortage of wood relative to the 40 year rotation.

Figure 5:

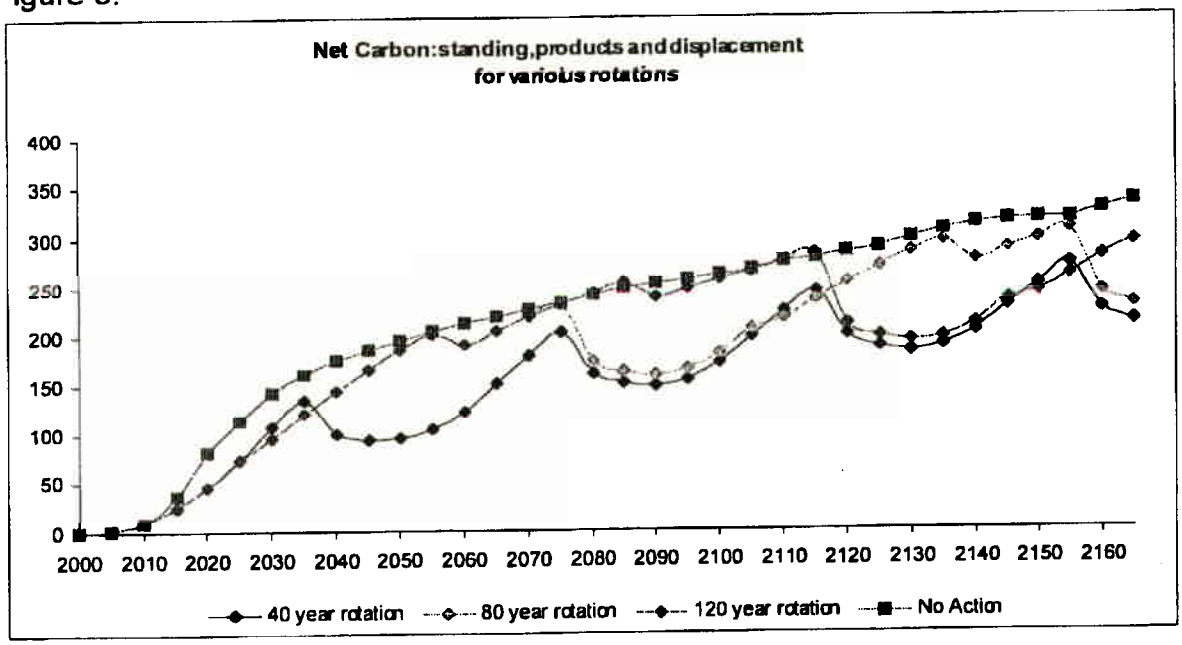
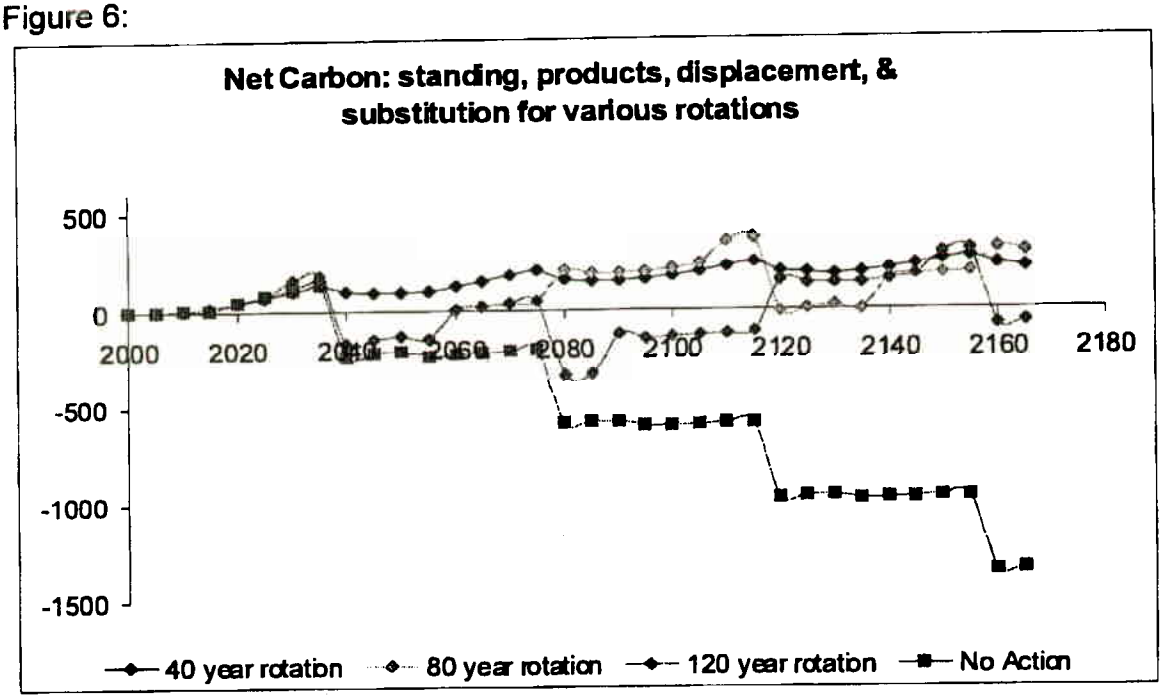


Figure 6:



The carbon in the forest is only useful for increasing carbon storage if land not in forestry is converted to forestry, a one time increase in storage, or if periodic harvests convert the trees to long lived products in an increasing pool of product storage, i.e. construction applications. For rotational forestry, the more intensive the management that increases the volume growth on short rotations that can produce long-lived products quickly, the more rapid the increase in carbon storage. In the PNW, that means intensive management on 45-50 year rotations for average site productivity is probably optimal and the higher the value of carbon in the short term it will likely reduce rather than increase the rotation age. If the carbon is valued more highly in the long term (hundreds of years) a high enough value for carbon could motivate longer rotations but not no-harvesting.

Bruce Lippke
Professor and Director RTI
& President CORRIM

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From: "Finn Krogstad" <fkrogsta@u.washington.edu>
Organization: University of Washington
Reply-To: <fkrogsta@u.washington.edu>
Date: Fri, 25 Oct 2002 14:32:04 -0700
To: "'Bruce Lippke'" <blippke@u.washington.edu>

Subject: RE: Whatcom Lake Technical Issues

Professor Lippke,

In regard to your questions about whether timber harvest increases runoff and landsliding; both impacts have been pretty well documented. What is poorly understood is the ecological impact of increasing runoff and landsliding.

Logging has been shown to increase peakflows. Since trees intercept and transpire (some) water, they can reduce the amount of water getting to the streams, particularly in Autumn storms. Similarly, since trees intercept (and melt) snowfall and blanket any underlying snowpack, they can reduce snowmelt during rain-on-snow floods. Harvesting the trees can thus be expected to increase resulting peakflows. These theoretical results are verified in a well controlled data set analyzed by Jones & Grant (1996).

There is considerable controversy about whether this effect is confined to the small flows (that happen several times a year) or whether it also is 'significant' in the larger floods (that have ecological and economic impact). Thomas & Megahan (1998) revisited the same data set and found that this effect of harvesting decreases with the size of the storm, and that there is not sufficient evidence to demonstrate a harvest induced increase for the size of storm (>2yr) that is typically of interest. This is the wrong question however, instead of asking about the SIZE of the small floods. What we really care about is the FREQUENCY of storms of a given size, such as the frequency of events that can scour salmon redds or blow-out bridges and culvers. My reanalysis of the Jones & Grant (1996) and Thomas & Megahan (1998) studies has suggested that harvesting turns out to have a greater impact on the large floods than on the small ones.

One way to avoid these impacts might be to disperse harvest units around the watershed, then harvest other units as these re-grow, and so on. Both Jones & Grant (1996) and Thomas & Megahan (1998) found that harvesting only part of the basin had a smaller impact than harvesting the entire basin all at once. A blunt reading of these results, however, is that more harvesting equals more flooding. If we use the analogy of a toxin however, we might view the increased peakflows as 'safe', so long as it is not too high, for too long, in any given reach.

Essential in dispersing harvests over time is the notion that as stands grow older, they replace the hydrologic effects of the stands that are about to be cut.

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Hydrologic maturity is the concept that supposedly makes preharvest peakflows smaller than postharvest peakflows. If there are lots of needles, then there should be lots of transpiration, interception, and snowpack insulation. It is more difficult to find actual data that shows peakflows getting back to their preharvest levels. This may be because hydrologic maturity requires much bigger trees than we might think. The H.J. Andrews data that Jones & Grant (1996) and Thomas & Megahan (1998) used shows a rapid peakflow decrease in the first 5 years after harvest, but no decline in peakflows in the next 20 years. As such, hydrologic maturity is an interesting concept, with lots of theoretical estimates of when stands should achieve hydrologic maturity, but lacking data to justify or select between these estimates.

It is thus clear that logging causes flooding, but is it ecologically bad to increase peakflow? This is much more difficult to answer than simple hydrologic questions. I might approach is as follows: If you want to know what a stream will look like if you increase peakflow, just go downstream to where another stream joins and increases the flow already. Do downstream reaches have such bad ecological value? There are streams all over the state with higher peakflows and lower peakflows. Do the higher peakflow streams have worse ecological value? If we increase the peakflow of the smaller stream to be more like one of the slightly larger streams. Will this be a bad thing? Would the streams be ecologically better if we could somehow reduce the streamflows? It might be argued that the change from one flow regime to another is the problem. Hydrologic change (both within years and between years) is an element of natural process, so it is difficult to declare this change to be a problem.

Landsliding has similarly been shown to increase after harvest. This has largely been linked to postharvest decay of the root systems of the harvested trees, but could also stem from post-harvest increases in soil saturation. The roots of the new stand gradually replace the decaying root system, but during the period (about 3-10 years after harvest in westside forests) when the old are decaying but the new haven't fully occupied the soil yet is when we see most of the post harvest landsliding.

This is not to say that unharvested stands do not landslide, they do. In fact, some have argued that there might be just as many of these landslides, but they are obscured by the forest canopy, so they are undercounted by air photo surveys of landsliding, making landslides only LOOK like they are more frequent under canopy. It might be argued the link between harvesting and landsliding is really just an issue of better counting of landslides in clearcuts, and that proper counting of landslides under forest canopy might identify just as many landslides as are found in clearcuts. This was part of the thinking in the Oregon landslide survey, which looked at landsliding under forest canopy, and found many more than had been previously suspected. This is a disturbing conundrum, but has not overcome the weight of observations relating logging to landsliding.

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The effects of logging on landsliding, over the long run, is less clear. Logging might just be seen as prematurely initiating landsliding that would have naturally happened in a few centuries anyway. Landslides need soil, and there is no reason to think that management will create soil faster, so landslide rates will be similar under managed and unmanaged forests.

The real question though is about the ecological impacts of landsliding. Landsliding is a natural process, so it might be viewed as being no more of an ecological problem than rain or sunshine. Landslide debris flows can scour out the existing habitat along their path, but does this mean that the new simplified habitat have less value? Landslide debris flows are an important source of gravel and wood that can not be transported down the small streams by normal stream flows. By harvesting, we may be making more landslides, but it is not clear that that is necessarily bad.

I hope this helps,

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